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November 15, 1999

GORDON L. PERSINGER  
Acting Executive Director  
Director, Research and Public Affairs

WESS A. HENDERSON  
Director, Utility Operations

ROBERT SCHALLENBERG  
Director, Utility Services

DONNA M. KOLILIS  
Director, Administration

DALE HARDY ROBERTS  
Secretary/Chief Regulatory Law Judge

DANA K. JOYCE  
General Counsel

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

FILED<sup>2</sup>

NOV 15 1999

Missouri Public  
Service Commission

RE: Case No. TA-2000-217

Dear Mr. Roberts:

Enclosed for filing in the above-captioned case are an original and fourteen (14) conformed copies of **STAFF'S MOTION FOR ADDITIONAL TIME TO FILE PROCEDURAL SCHEDULE**.

This filing has been mailed or hand-delivered this date to all counsel of record.

Thank you for your attention to this matter.

Sincerely yours,

Nathan Williams  
Assistant General Counsel  
(573) 751-8702  
(573) 751-9285 (Fax)

NW/mm  
Enclosure  
cc: Counsel of Record

BEFORE THE PUBLIC SERVICE COMMISSION  
OF THE STATE OF MISSOURI

FILED<sup>2</sup>

NOV 15 1999

Missouri Public  
Service Commission

In the Matter of the Application of HJN )  
Telecom, Inc. for a Certificate of Service )  
Authority to provide Basic Local )  
Telecommunications Services in Portions )  
of the State of Missouri and to Classify )  
Such Services and the Company as )  
Competitive. )

Case No. TA-2000-217

**STAFF'S MOTION FOR ADDITIONAL TIME TO FILE PROCEDURAL SCHEDULE**

Comes now the Staff of the Missouri Public Service Commission (Staff), by counsel, and for its Motion for Additional Time to File Procedural Schedule states as follows:

1. On September 7, 1999, HJN Telecom, Inc. (HJN), a Georgia corporation, filed its Application for a Certificate of Service Authority to provide Basic Local Telecommunications Services in Portions of the State of Missouri and to Classify Such Services and the Company as Competitive.

2. On September 14, 1999, the Commission issued its Notice of Application and deadline for intervention. On October 7, 1999, Southwestern Bell Telephone Company (SWBT) filed its timely application to intervene which the Commission granted on October 19, 1999. No other parties intervened.

3. On October 20, 1999, the Commission issued a corrected Order setting a Prehearing Conference on November 8, 1999 and the filing of a Proposed Procedural Schedule by 3:00 P.M. on November 15, 1999.

4. The parties advised the Commission they anticipated settlement and on November 8, 1999, the Commission issued its Order Canceling Prehearing Conference in which it canceling

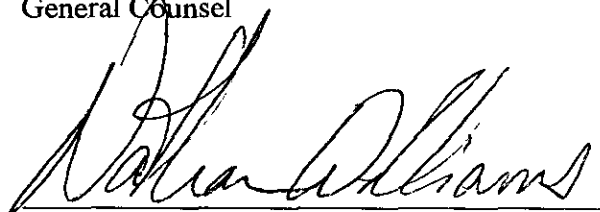
the prehearing conference and ordered the parties to file a proposed stipulation and agreement by November 15, 1999, if they had not filed a stipulation and agreement by that date.

5. HJN has advised the Staff that it has approval from SWBT to enter into a stipulation and agreement; however, the Staff is requiring HJN make an additional filing with the Commission disclosing additional information regarding the technical expertise of the applicant. HJN, today, has disclosed to Staff the additional information it proposes to file. When HJN files with the Commission the additional information as disclosed to the Staff, the Staff is prepared to enter into a stipulation and agreement for filing in this case which will resolve all issues.

WHEREFORE, the Staff respectfully moves the Commission to grant the parties until Monday, November 22, 1999, to file a Stipulation and Agreement or Procedural Schedule.

Respectfully submitted,

DANA K. JOYCE  
General Counsel

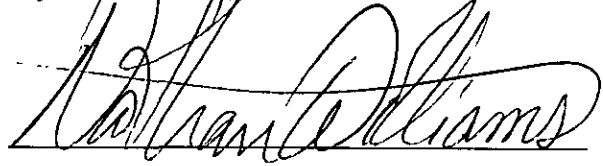
A handwritten signature in black ink, appearing to read "Nathan Williams", is written over a horizontal line.

Nathan Williams  
Assistant General Counsel  
Missouri Bar No. 35512

Attorney for the Staff of the  
Missouri Public Service Commission  
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### **Certificate of Service**

I hereby certify that copies of the foregoing have been mailed or hand-delivered to all counsel of record as shown on the attached service list this 15<sup>th</sup> day of November, 1999.

A handwritten signature in cursive script, appearing to read "William Williams", is written over a horizontal line.

Service List for  
Case No. TA-2000-217  
November 15, 1999

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