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June 21, 2000

**FILED<sup>3</sup>**

JUN 21 2000

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

Missouri Public  
Service Commission

RE: Case No. TE-2000-733

Dear Mr. Roberts:

Please find enclosed for filing in the above-referenced matter an original and eight (8) copies of "Supplemental Request of TON Services, Inc." This supplemental pleading is filed in response to the Commission's "Order Requiring Filing" entered in this proceeding on June 15, 2000. Please bring this filing to the attention of the appropriate Commission personnel.

Thank you for your assistance in this matter.

Sincerely,

FISCHER & DORITY, P.C.

By:

  
Larry W. DORITY

Enclosures

cc: Mo.P.S.C. General Counsel  
Office of the Public Counsel

BEFORE THE PUBLIC SERVICE COMMISSION  
STATE OF MISSOURI

FILED<sup>3</sup>

JUN 21 2000

Missouri Public  
Service Commission

In the Matter of the Request of TON )  
Services, Inc. for an Extension of )  
Time to File Annual Report )

Case No. TE-2000-733

**SUPPLEMENTAL REQUEST OF TON SERVICES, INC.**

COMES NOW TON Services, Inc. ("TON"), by and through its attorneys and, pursuant to 4 CSR 240-10.080(8) and in response to the Commission's "Order Requiring Filing" ("Order") entered in this proceeding on June 15, 2000, respectfully submits its supplemental pleading in accordance with said Order. In support of its Supplemental Request, TON states as follows:

1. TON adopts and incorporates by reference all of the statements and allegations contained in its "Request of Ton Services, Inc. To Extend The Filing Date For Its Annual Report" ("Request") filed in this matter on May 4, 2000. The copy of the Annual Report which is the subject of this proceeding was attached to the original Request and remains in the possession of the Commission.

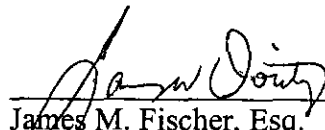
2. The above-referenced Order of this Commission provides, at page 2: "That Ton Services, Inc. shall file a supplemental pleading, no later than 3:00 p.m. on July 5, 2000, explaining why it could not file its annual report pursuant to Commission Rule 4 CSR 240-10.080(8) until May 4, 2000."

3. As stated in Paragraph 3 of its original Request, Ton made diligent efforts to complete its 1999 Annual Report for submission by April 15, 2000, but it was not able to file a

complete and accurate report by that date. As a new certificated provider of interexchange telecommunications service (Missouri certificate issued on September 27, 1999), company management did not correctly anticipate the amount of company resources and time that would be necessary to complete and file accurate annual reports in its many serving jurisdictions. Accordingly, TON attempted to file its 1999 Annual Report with this Commission on April 21, 2000, with said document being returned by the Commission to TON with accompanying correspondence that date. Upon receiving said correspondence via the U.S. Mail, and in conformance with the notation contained therein that said late Report must be filed by a Missouri attorney, an officer of TON contacted the undersigned attorneys and sent the subject Annual Report for filing under correspondence dated April 26, 2000. Upon receiving said information, the undersigned attorneys prepared the original Request, received approval from the client, and filed the Request with this Commission on May 4, 2000. The above actions were taken in an expeditious manner and as soon as practicable.

WHEREFORE, TON Services, Inc. respectfully requests, pursuant to 4 CSR 240-10.080(8), that the Commission accept this Supplemental Request as being responsive to its Order dated June 15, 2000, and further grant its original request for an extension of time for filing its Annual Report, and for any other relief appropriate in the circumstances.

Respectfully submitted,

  
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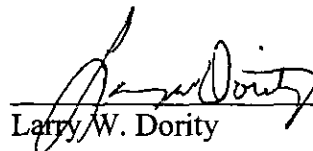
Attorneys for TON Services, Inc.

### CERTIFICATE OF SERVICE

I do hereby certify that a true and correct copy of this document has been hand-delivered or mailed, First Class mail, postage prepaid, this 21<sup>st</sup> day of June, 2000, to:

General Counsel  
Missouri Public Service Commission  
P.O. Box 360  
Jefferson City, MO 65102

Office of the Public Counsel  
P.O. Box 7800  
Jefferson City, MO 65102

  
Larry W. Dority