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May 8, 2000

**FILED**<sup>2</sup>

MAY 09 2000

Missouri Public  
Service Commission

Mr. Dale Hardy Roberts  
Public Service Commission  
301 West High Street, Suite 530  
Jefferson City, MO 65101

**Re: In the Matter of the Application of CAT Communications  
International, Inc. for a Motion To Establish  
Prodecural Schedule;  
Our File No.: 343**

Dear Mr. Roberts:

Enclosed please find an original and fourteen (14) copies of the Motion regarding the above-referenced corporation. Please file these motions accordingly.

Thank you for your cooperation and assistance in this regard.

Sincerely yours,

*Janice Dames*  
Janice Dames  
Legal Assistant

jd  
Enclosures  
cc: Monica Borne  
Office of Public Counsel  
(w/enclosures)

BEFORE THE PUBLIC SERVICE COMMISSION  
OF THE STATE OF MISSOURI

FILED<sup>2</sup>

MAY 09 2000

Missouri Public  
Service Commission

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

Case No. TA-2000-347

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**MOTION TO ESTABLISH 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 telecommunications service in Missouri and for competitive classification. Along with the application, CAT submitted proposed tariffs with an effective date of January 25, 2000.

2. The Commission issued an Order on December 14, 1999, directing parties wishing to intervene to file their requests by January 13, 2000. 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. On January 10, 2000, Southwestern Bell Telephone Company (SWBT) also filed an Application to Intervene.

3. On December 14, 1999, the Commission issued its notice of deficiency, stating that it could not proceed with this case until CAT complied with the Commission's rules concerning information required to be included in an application. CAT cured the deficiencies on January 14, 2000, by filing its amendment to its application.

20

4. On December 22, 1999, CAT submitted two sets of substitute tariff sheets. On January 14, 2000, CAT filed its second amendment to its application for a certificate of service authority, and, *inter alia*, CAT withdrew the two tariffs.

5. On February 1, 2000, the Commission ordered, *inter alia*, that the parties file a procedural schedule no later than February 16, 2000. Since a procedural schedule had not been filed by February 24, 2000, the Commission entered its notice of default, stating that no further action would be taken on this case until the parties cured the default.

6. On February 25, 2000, CAT filed its motion for a continuance of the filing of the procedural schedule for thirty (30) days in order to allow time for negotiation of a stipulation and agreement between CAT and the intervenors, which the Commission granted, giving the parties until March 31, 2000, to file a proposed procedural schedule.

No party filed any pleading by the deadline set by the Commission.

7. On April 4, 2000, CAT filed its second Motion for Continuance requesting an additional 30 days to finalize the stipulation and agreement between CAT and the intervenors.

8. On April 20, 2000, the Commission granted this second continuance and ordered the parties to file a proposed procedural schedule no later than 3:00 p.m. on May 10, 2000.

9. The parties are still negotiating the stipulation and agreement, however, an agreement is expected shortly. Due to an issue regarding the Company's financial status which was raised by Staff, the submission of the final stipulation and agreement for Staff approval has been delayed. However, an agreement on the stipulation and agreement is expected to be reached within the next ten (10) days.

10. In order to meet the deadlines established by the Commission the parties hereby proposes the following procedural schedule:

June 15, 2000	Direct Testimony
July 3, 2000	Rebuttal Testimony
August 1, 2000	Surrebuttal Testimony
August 23, 2000	List of Witnesses and Issues
September 30, 2000	Statement of Positions

WHEREFORE, the parties request that the Commission approve the proposed procedural schedule.

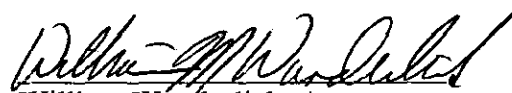
Respectfully submitted,



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#### **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 8<sup>th</sup> day of May, 2000.



William Wunderlich, Attorney

STATE OF MISSOURI  
PUBLIC SERVICE COMMISSION  
JEFFERSON CITY  
May 8, 2000

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