

**BEFORE THE PUBLIC SERVICE COMMISSION  
OF THE STATE OF MISSOURI**

In the Matter of the Tariff Filing by )	
Choctaw Telephone Company to Establish )	Case No. IT-2009-0366
a 15-day Due Date for Bills. )	Tariff File No. JI-2009-0655

**STAFF’S RESPONSE TO SUGGESTIONS IN OPPOSITION TO MOTION TO SUSPEND**

COMES NOW the Staff of the Missouri Public Service Commission and for its response states:

1. On March 16, 2009, Choctaw Telephone Company submitted a revised tariff sheet designed to reduce the due date for a subscriber’s bill from 21 days after the bill is rendered to 15 days after the bill is rendered. Choctaw has a waiver of the Commission rule, 4 CSR 240-33-040(5), that establishes a 21-day due date for residential customers’ bills.
2. On April 8, 2009, the Staff filed a motion requesting the Commission to suspend and set the tariff submission for hearing. In the Staff’s opinion, Choctaw’s proposal to reduce the due date for a subscriber’s bill to 15 days after the bill is rendered is not just and reasonable.
3. On April 13, 2009, Choctaw filed its suggestions in opposition to the Staff’s motion. In general, Choctaw alleges that some other entities utilize due dates around 15 days.
4. The allegations in Choctaw’s suggestions should be addressed through the hearing process. For example, Choctaw confuses the City of Kansas City with KCPL. Choctaw alleges that “the city of Kansas City (KCPL)” appears to utilize a due date of 15 days or less. KCPL’s tariff, P.S.C. MO. No. 2, Revised Sheet No. 1.26, which is on file with the Commission, provides that any unpaid bill for service under a Residence Service rate schedule shall become delinquent on the twenty-second day after rendition. Further, it is not clear from Choctaw’s suggestions whether the other entities’ due dates are for residential service or for business service.

WHEREFORE, the Staff requests the Commission to suspend, and set for hearing, Choctaw's tariff submission in File No. JI-2009-0655.

Respectfully submitted,

/s/William K. Haas

William K. Haas  
Deputy General Counsel  
Missouri Bar No. 28701

Attorney for the Staff of the  
Missouri Public Service Commission  
P. O. Box 360  
Jefferson City, MO 65102  
(573) 751-7510 (Telephone)  
(573) 751-9285 (Fax)  
[william.haas@psc.mo.gov](mailto:william.haas@psc.mo.gov)

### **CERTIFICATE OF SERVICE**

I hereby certify that copies of the foregoing have been mailed, hand-delivered, transmitted by facsimile or electronically mailed to all parties listed below this 13th day of April, 2009.

Amanda Molina  
505 Plaza Circle, Ste 200  
Orange Park, FL 32073

Craig Johnson  
1648A East Elm Street  
Jefferson City, MO 65101

Lewis R. Mills, Jr.  
Office of Public Counsel  
P.O. Box 2230  
200 Madison Street, Ste 650  
Jefferson City, MO 65102

/s/William K. Haas

William K. Haas