

**Jack C. Lorenz**  
General Solicitor-Missouri  
(314) 247-5224

**James E. Taylor**  
General Attorney-Missouri  
(314) 247-1966

**Alfred G. Richter, Jr.**  
Attorney 247-2958  
**Edward L. Eckhart**  
Attorney 247-4911  
**Martin E. Grambow**  
Attorney 247-5878

**Southwestern Bell**

Legal Department, Rm. 630  
100 North Tucker Boulevard  
St. Louis, Missouri 63101

RECEIVED

SEP 17 1982

COMMISSION COUNSEL  
PUBLIC SERVICE COMMISSION

September 17, 1982

Mr. Harvey G. Hubbs, Secretary  
Missouri Public Service Commission  
P. O. Box 360  
Jefferson City, Missouri 65101

Re: Case No. TR-82-199; Southwestern Bell Telephone  
Company's Missouri Rate Case.

Dear Mr. Hubbs:

Enclosed is Southwestern Bell Telephone Company's  
Motion to Compel Responses to Information Requests.

Copies of the enclosed are being sent this date  
to Mr. Kent Ragsdale and Mr. Jim Fischer.

Very truly yours,

  
Jack C. Lorenz

Enclosure

BEFORE THE PUBLIC SERVICE COMMISSION

OF THE STATE OF MISSOURI

In the matter of the filing by )  
Southwestern Bell Telephone )  
Company of new intrastate )  
rates, tolls and charges ) Case No. TR-82-199  
applicable to intrastate )  
telecommunication services )  
furnished within the State )  
of Missouri. )

MOTION TO COMPEL RESPONSES TO INFORMATION REQUESTS

Comes now Southwestern Bell Telephone Company (Company) and moves the Commission for its Order directing the Department of Defense and J. W. Wilson, each to answer information requests served on them by the Company and, as grounds for its motion, Company respectfully states as follows:

1. On August 24, 1982, Company propounded Information Request No. 2 to the Department of Defense Witness, Mark Langsam, regarding his direct and rebuttal testimony dated August 9, 1982.
2. On September 9, 1982, Company propounded Information Request No. 11 to Staff directed to Commission Witness, John W. Wilson, regarding his direct testimony dated August 23, 1982.
3. As of the date of this Motion, neither Department of Defense Witness, Langsam, nor Commission Witness, Wilson, has responded to, or objected to, Company's Information Requests. Both Information Requests covered requests for responses not later than September 16, 1982.
4. Department of Defense Witness, Langsam, is scheduled to testify regarding the Cost of Equity/Cost of Capital issues on Wednesday, September 22, 1982 pursuant to a special setting to accommodate Langsam's schedule. Commission Witness, Wilson, is scheduled to testify regarding the "intrastate rate of return" issue on Thursday, September 23, 1982.
5. The failure of these witnesses to respond in a


timely manner to Southwestern Bell's legitimate information requests severely hampers Company's ability to prepare fully for hearing, especially the cross examination of these witnesses. The continued failure of these witnesses to respond to Company's information requests will aggravate the prejudice to Company's ability to prepare for hearing.

WHEREFORE, Company prays that the Commission order Department of Defense Witness, Langsam, and Commission Witness, Wilson, to answer Company's information requests not later than noon, Monday, September 20, 1982.

Respectfully submitted,

SOUTHWESTERN BELL TELEPHONE COMPANY

By

  
JACK C. LORENZ, JAMES E. TAYLOR,  
ALFRED G. RICHTER, JR., MARTIN E.  
GRAMBOW, AND EDWARD L. ECKHART  
Attorneys for Southwestern Bell  
Telephone Company  
100 N. Tucker Boulevard, Rm. 630  
St. Louis, Missouri 63101  
Telephone: 314 247-5224

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing Motion to Compel Responses to Information Requests was hand-delivered or mailed, postage prepaid, to Mr. Kent M. Ragsdale, General Counsel, Missouri Public Service Commission, P. O. Box 360, Jefferson City, Missouri, 65102; Mr. James M. Fischer, Public Counsel, 1014 Northeast Drive, Jefferson City, Missouri, 65101; this 17th day of September, 1982.

