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March 7, 2000

FILED<sup>2</sup>

MAR 0 7 2000

Missouri Public Service Commission

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

Re:

DAVID V.G. BRYDON

GARY W. DUFFY

PAUL A. BOUDREAU

SONDRA B. MORGAN

JAMES C. SWEARENGEN

WILLIAM R. ENGLAND, III

JOHNNY K. RICHARDSON

Case No. TA-2000-23 et al.

Dear Mr. Roberts:

Enclosed for filing in the above-referenced matter, please find an original and fourteen copies of the Motion for Suspension of Procedural Schedule.

Please see that this filing is brought to the attention of the appropriate Commission personnel. Copies of the enclosed documents are being provided to counsel of record. I thank you in advance for your cooperation in this matter.

Sincerely,

W.R. England/III

WRE/da Enclosure

cc.

Counsel of Record

FILED<sup>2</sup>

## BEFORE THE PUBLIC SERVICE COMMISSION STATE OF MISSOURI

In the Matter of the Application of	) Service Commissio
Fiber Four Corporation, d/b/a KLM Long	)
Distance for a Certificate of Service	) Case No. TA-2000-23
Authority to Provide Interexchange and	) (Tariff No. 200000049)
Local Exchange Telecommunications Services	
in Missouri.	)
In the Matter of the Revised Tariff Filing	) Case No. TA-2000-24
of Fiber Four Corporation d/b/a Holway	) (Tariff No. 200000048)
Long Distance.	)
In the Matter of the Revised Tariff Filing	) Case No. TA-2000-25
of Fiber Four Corporation d/b/a Iamo	) (Tariff No. 200000047)
Long Distance.	)
In the Matter of the Application of	)
Fiber Four Corporation, d/b/a Rock Port Long	)
Distance for a Certificate of Service	) Case No. TA-2000-27
Authority to Provide Interexchange and	) (Tariff No. 200000046)
Local Exchange Telecommunications Services	)
in Missouri.	)

## MOTION FOR SUSPENSION OF PROCEDURAL SCHEDULE

Comes now Fiber Four Corporation ("Fiber Four") and for its Motion for Suspension of Procedural Schedule states to the Missouri Public Service Commission ("Commission") as follows:

- 1. On July 15, 1999, Fiber Four initiated the above-captioned cases by filing four separate applications for certificates of service authority to provide interexchange telecommunications services in the state of Missouri for each of the fictitious names referenced in the caption.
- 2. On July 30, 1999, AT&T Communications, Inc., ('AT&T") filed an "Application to Intervene and a Motion to Consolidate" in each of these cases.

6) July 1

3. On August 3, 1999, the Commission issued its Order consolidating the above cases for hearing .

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- 4. On July 29, 1999, the Commission issued its Order Regarding Temporary Authority in Case No. TA-00-24 in which it granted Fiber Four d/b/a Holway Long Distance at temporary certificate of service authority to provide intrastate interexchange and local exchange telecommunications services. Also on July 29, 1999, the Commission issued its Order Regarding Temporary Authority in Case No. TA-2000-27 in which it granted a temporary certificate to Fiber Four d/b/a Rock Port Long Distance.
- 5. On August 26, 1999, the Commission issued an Order Regarding Temporary Authority, Order Granting Intervention and Order Denying Consolidation in which it granted temporary certificates to Fiber Four d/b/a KLM Long Distance in Case No. TA-2000-23 and Fiber Four d/b/a Iamo Long Distance in Case No. TA-2000-25.
- 6. On November 18, 1999, the Commission issued its Order Adopting Procedural Schedule in which it set dates for the filing of testimony and hearing in the request for permanent certification. On January 20, 2000, Fiber Four filed direct testimony and on February 17, 2000, all other parties filed rebuttal testimony. Surrebuttal and cross-rebuttal testimony of all parties is due March 6, 2000.
- 7. The parties to this case have had discussions which they believe may lead to the filing of a Stipulation and Agreement in this case which would resolve all issues. In order to give the parties time to negotiate an agreement, Fiber Four requests that the procedural schedule previously established by the Commission be suspended for forty-five (45) days in order to allow the parties time to complete their settlement negotiations. Such an unanimous stipulation and

agreement would likely result in dismissal of the instant case and no further action would be required of the Commission other than approval of same. If, on the other hand, the parties are unable to negotiate an agreement within that time period, they will suggest a new procedural schedule to the Commission.

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8. All parties including the Commission Staff, the Office of Public Counsel and AT&T have been contacted and consent to this request for suspension.

Wherefore, Fiber Four respectfully requests that the Commission grant its Motion to Suspend Procedural Schedule and for any other relief appropriate in the circumstances.

Respectfully submitted

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Mo. Bar #35482

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## Certificate of Service

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