## BEFORE THE MISSOURI PUBLIC SERVICE COMMISSION

COMPUTECHNOLOGY, INC.	)	
v.	)	Case No.
PECTRA COMMUNICATIONS GROUP, L.L.C.,	)	
CENTURYTEL, INC.,	)	
and	)	
GTE MIDWEST, INC., d/b/a VERIZON MIDWEST	)	

## MOTION FOR EXPEDITED TREATMENT

Comes now Computechnology, Inc. ("Computechnology" or "Applicant") and pursuant to 4 CSR 240-2.080(16) and for its Motion for Expedited Treatment states to the Commission as follows:

- 1. Computechnology has filed a Complaint before the Commission alleging unlawful and anticompetitive behavior by Spectra Communications Group, L.L.C., ("Spectra"), CenturyTel, Inc. ("CenturyTel"), and GTE Midwest, Inc., d[bla Verizon Midwest ("Verizon"), collectively referred to herein as the "Companies."
- 2. Computechnology is an Internet service provider located in Humansville, Missouri, and relies on the Companies' telecommunications facilities and services to deliver Internet access services to its customers. Computechnology competes directly with the Companies' affiliated local Internet service provider.
- 3. The referenced instances of unlawful and anticompetitive behavior include the following: (a) erroneously assigning, using and listing Computechnology's fax number as its hunt group pilot number, resulting in an unknown number of connection failures;

- (b) erroneously billing for services rendered by (i) attributing local charges to inaccurate billing account numbers, (ii) billing Computechnology for interstate coin access service when no such service exists, and (iii) attributing non-regulated router lease charges as regulated local charges; (c) refusing to timely make the Companies' Cyber DSS service readily available to Computechnology, (d) refusing to correct inordinately slow connection times related to Computechnology's T-1 dial-up access service, (e) refusing to provide direct frame relay service to Computechnology when that service is readily available, (f) instead providing indirect frame relay service resulting in billings based on mileage (86 miles) when the connection served is three city blocks away, and (g) refusing to maintain the non-regulated router as required by the parties' lease. On information and belief, the Companies' affiliated Internet service provider has not been subject to any of the noted problems.
- 4. On May 28, 2002, the Companies effected a disconnection of service to Computechnology for its refusal to pay disputed charges for regulated services. Such disconnection has resulted in service interruptions to Computechnology's customers, and as a result of such interruptions, Computechnology has lost and will continue to lose customers.
- 5. Absent immediate relief from the Commission, the disconnection threatens
  Computechnology's ability to continue its Internet access operations and will lead to the
  Company's dissolution. Every day that passes is critical to Computechnology's future.
  Computechnology accordingly requests that the Commission act immediately to order the
  Companies to restore service, but in no event later than June 3, 2002.

- 6. By granting the requested relief the Commission will avoid the harm resulting from the disconnection, specifically the immediate deprivation of service to Computechnology and its customers and the resulting reduction in competition among Internet service providers within the applicable exchanges. The benefits to be accrued are the immediate restoration of such service and competition.
- 7. Applicant submits that there will be no undue negative effect on customers or the general public if the Commission acts as soon as possible and grants the requested relief no later than June 3, 2002.
- 8. This motion and the corresponding complaint were filed as soon as they could have been under the circumstances presented.

WHEREFORE, Applicant respectfully requests the Commission to preserve the status quo by immediately entering an order directing the Companies to immediately reconnect, and further prohibiting the companies from disconnecting, service to Computechnology pending resolution of the aforesaid Complaint.

Respectfully submitted,

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## CERTIFICATE OF SERVICE

A true and correct copy of the foregoing was sent by first class US Mail, postage prepaid, this 31st day of MAy 2002, to:

Office of Public Counsel PO Box 7800 Jefferson City, Missouri 65102

General Counsel Missouri Public Service Commission PO Box 360 Jefferson City, Missouri 65102

Spectra Comunications Group, L.L.C. 8800 Blue Ridge Boulevard Kansas City, Missouri 64138-4061

CenturyTel, Inc. 100 CenturyTel Drive Monroe, Louisiana 71203

GTE Midwest, Inc., d/b/a Verizon Midwest Building A 1000 Verizon Drive Wentzville, Missouri 63385-1941.