

Regulatory and
Governmental Affairs



601 Monroe Street, Suite 304
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November 29, 2001

FILE COPY

Mr. Dale Hardy Roberts
Secretary/Chief Administrative Law Judge
Missouri Public Service Commission
200 Madison Street, Suite 100
Jefferson City, Missouri 65101

SUBJECT: Sam Wood, Complainant, vs.
Verizon (Credit Plus Collection Services), Respondent
Case No. TC-2002-211

Dear Mr. Roberts:

Enclosed for filing is the original and eight (8) copies of Verizon Midwest's *Motion To Dismiss* in the above-referenced case.

If you have questions, please call me at 573/636-7196.

Sincerely,

A handwritten signature in cursive script that reads "Dave Evans".

Dave Evans
Director-Regulatory Affairs

DE:am
Enclosure

c: Office of Public Counsel (2)
General Counsel
Mr. Sam Wood

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BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI

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Sam Wood,)	
)	
Complainant,)	
)	
vs.)	Case No. TC-2002-21
)	
Verizon (Credit Plus Collection Services),)	
)	
Respondent.)	

VERIZON MIDWEST'S ANSWER AND MOTION TO DISMISS

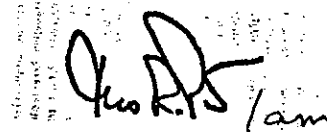
On October 26, 2001 Mr. Wood filed a formal complaint with the Public Service Commission of Missouri ("Commission") alleging that he was not responsible for certain charges that appeared on his account that closed in May 1999. The total charges in dispute equal \$143.72.

Verizon Midwest states as follows:

1. Verizon Midwest admits that it provided ISDN service to Mr. Wood.
2. Verizon Midwest explained to Mr. Wood the nature of the charges in two informal proceedings, one in 1999 and one in 2001.
3. Verizon Midwest Received Partial payments from Mr. Wood, and credited these payments to Mr. Wood's regulated services.
4. The remaining balance owed by Mr. Wood (\$143.72) is for internet access service provided by Verizon Online. Verizon Online is a non-regulated internet service provider and the service that it provides is non-regulated service.

5. Verizon Midwest denies all other allegations in Mr. Wood's complaint.
6. Given that the amount in dispute relates to a non-regulated service provided by a non-regulated entity, Verizon Midwest respectfully requests that the Commission dismiss the complaint.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Tom R. Parker", with a stylized flourish at the end.

Thomas R. Parker
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972/718-6361
Fax: 972/718.3403
e-mail: tom.parker@verizon.com

Date: November 29, 2001