

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

In the Matter of an Investigation into)
Various Issues Related to the Missouri)
Universal Service Fund)

Case No. TO-98-329

**THE SMALL TELEPHONE COMPANY GROUP'S CONCURRENCE
IN SBC MISSOURI'S RESPONSE TO
STAFF'S MOTION FOR ORDER REGARDING ASSESSMENTS AND SURCHARGES**

Comes now the Small Telephone Company Group ("STCG") and for its Concurrence in SBC Missouri's Response to Staff's Motion for Order Regarding Assessments and Surcharges states to the Missouri Public Service Commission ("Commission") as follows:

I. INTRODUCTION

1. The STCG member companies are preparing to implement the Missouri Universal Service Fund ("MoUSF") surcharge and begin offering the associated MoUSF assistance to disabled and low-income Missouri customers. On February 16, 2005, the Commission's Staff filed a motion requesting that the Commission take various steps towards implementing the Fund. On February 28, 2005, SBC Missouri filed a response identifying certain timing issues that have not yet been addressed. The STCG agrees with SBC Missouri that more information is needed about the timing of the disbursements to companies and discounts to customers of MoUSF support.

II. TIMING ISSUES

2. SBC Missouri points out that the MoUSF Fund Administrator must “strike a balance between the timing of carrier payments of assessments and two matters of great importance under the Commission’s rules: (a) the timing of discounts available to eligible low-income and disabled customers and (b) the timing of reimbursements to carriers that afford their customers such discounts.” These two critical timing issues have not been addressed in Staff’s pleading. The STCG requests that these timing issues be resolved before the Commission orders implementation of the assessments and surcharges.

III. CONCLUSION

WHEREFORE, the STCG respectfully requests that the Commission address the timing issues identified by SBC Missouri before ordering implementation of the MoUSF assessments and surcharges.

Respectfully submitted,

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Certificate of Service

I hereby certify that copies of the foregoing have been mailed, hand-delivered, or served electronically to all counsel of record 3rd day of March, 2005.

/s/ Brian T. McCartney

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