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November 7, 2002

Via UPS Next Day Air

Hon. Dale Hardy Roberts
Chief Administrative Law Judge
Missouri Public Service Commission
Governor Office Building
Records Department
P.O. Box 360
200 Madison, Suite 100
Jefferson City, MO 65102-0537

FILED⁴

NOV 08 2002

Missouri Public
Service Commission

**Re: Metrocall, Inc., Supplemental Pleading in Response to
Order Directing Filing: Case No. IK-2003-0158**

Dear Judge Roberts:

Enclosed please find the original and five copies of Metrocall, Inc.'s Supplemental Pleading in Response to Order Directing Filing ("Supplemental Pleading"). Also enclosed is an additional photocopy of the Supplemental Pleading. Please date-stamp that photocopy and return it to this office in the enclosed self-addressed stamped envelope.

One Atlantic Center
1201 West Peachtree Street
Atlanta, GA 30309-3424
404-881-7000
Fax: 404-881-7777

Bank of America Plaza
101 South Tryon Street, Suite 4000
Charlotte, NC 28280-4000
704-444-1000
Fax: 704-444-1111

90 Park Avenue
New York, NY 10016
212-210-9400
Fax: 212-210-9444

3201 Beechleaf Court, Suite 600
Raleigh, NC 27604-1062
919-862-2200
Fax: 919-862-2260

Hon. Dale Hardy Roberts
November 7, 2002
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Thank you very much for your assistance with this matter. If you require any further information, please do not hesitate to contact me.

Sincerely,

A handwritten signature in black ink, appearing to read "A. T. Spence".

Andrew T. Spence
Counsel to Metrocall, Inc.

Enclosures

cc: John B. Coffman (w/enc.)
Dana K. Joyce (w/enc.)
Mel Flowers, SBC (w/enc.)
Tim Judge, SBC (w/enc.)

BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI

FILED⁴

NOV 08 2002

APPLICATION OF METROCALL, INC.)
FOR APPROVAL OF AN)
INTERCONNECTION AGREEMENT WITH)
SOUTHWESTERN BELL TELEPHONE)
COMPANY PURSUANT TO THE)
TELECOMMUNICATIONS ACT OF 1996)

Missouri Public
Service Commission

CASE NO. IK-2003-0158

**SUPPLEMENTAL PLEADING IN RESPONSE TO
ORDER DIRECTING FILING**

COMES NOW Metrocall, Inc. ("Metrocall"), and files this Supplemental Pleading in Response to the Order Directing Filing ("Order") from the Missouri Public Service Commission dated October 29, 2002.¹ In the Order, the Commission requested that Metrocall file a Supplemental Pleading providing certain additional information respecting the above-captioned Application.² Accordingly, Metrocall submits this Supplemental Pleading containing the requested information.

1. Metrocall is a foreign corporation, incorporated in the State of Delaware. On March 5, 1999, Metrocall was issued a certificate from the Missouri Secretary of State, authorizing it to do business in Missouri – Charter No. F00466750. A copy of that certificate is attached hereto.³

2. Metrocall does not do business under a fictitious name.

3. Metrocall has attached a statement from its Senior Vice President for Engineering, concerning: (a) whether Metrocall has any pending actions or final unsatisfied judgments or decisions against Metrocall from any state or federal agency or

1 A copy of the Order Directing Filing is attached hereto as Exhibit One.

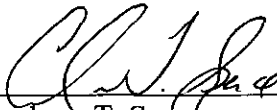
2 Id. at 2.

3 See Certificate of Authority, a copy of which is attached hereto as Exhibit Two.

court involving customer service or rates, which action, judgment, or decision occurred within three years of the date of the above-captioned Interconnection Agreement; and (b) that Metrocall has no overdue annual report or assessment fees.⁴

Respectfully submitted,

METROCALL, INC.

By: 
Andrew T. Spence
Counsel to Metrocall, Inc.
MO Bar No. 53270

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101 South Tryon Street, Suite 4000
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November 7, 2002

⁴ See Statement of Kenneth Goldstein, a copy of which is attached hereto as Exhibit Three. A facsimile copy is attached hereto. The original statement will be sent to the Commission under separate cover.



BEFORE THE PUBLIC SERVICE COMMISSION

OF THE STATE OF MISSOURI

Application of Metrocall, Inc. for Approval of an
Interconnection Agreement with Southwestern Bell
Telephone Company Pursuant to the
Telecommunications Act of 1996

)
)
)

Case No. IK-2003-0158

ORDER DIRECTING FILING

This order directs the applicant to supply further information.

On October 24, 2002, Metrocall, Inc., filed with the Missouri Public Service Commission its application for approval of an interconnection agreement with Southwestern Bell Telephone Company.

Commission Rule 4 CSR 240-2.060(1) states, in part:

(1) All applications shall comply with the requirements of these rules and shall include the following information:

...

(B) If any applicant is a Missouri corporation, a Certificate of Good Standing from the secretary of state;

...

(C) If any applicant is a foreign corporation, a certificate from the secretary of state that it is authorized to do business in Missouri;

...

(E) If any applicant does business under a fictitious name, a copy of the registration of the fictitious name with the secretary of state;

...

(G) If any applicant has submitted the applicable information as set forth in [subsections (1)(B), (C), or (E)] of this rule in a previous application, the same may be incorporated by reference to the case number in which the information was furnished, so long as such applicable information is current and correct;

...

(K) A statement indicating whether the applicant has any pending action or

final unsatisfied judgments or decisions against it from any state or federal agency or court which involve customer service or rates, which action, judgment or decision has occurred within three (3) years of the date of the application;

(L) A statement that no annual report or assessment fees are overdue....

Metrocall's application did not comply with those parts of Commission Rule 4 CSR 240-2.060(1) cited above in that it did not include: (1) If Metrocall is a Missouri corporation, a certificate of good standing from the Secretary of State; (2) If Metrocall is a foreign corporation, a certificate from the Secretary of State that it is authorized to do business in Missouri; (3) If Metrocall does business under a fictitious name, a copy of the registration of the fictitious name with the Missouri Secretary of State; (4) If Metrocall has submitted the applicable information as set forth in subsections (1)(B), (C), or (E) of the rule in a previous application, the reference to the case number in which the information was furnished, so long as such applicable information is current and correct; (5) A statement indicating whether Metrocall has any pending action or final unsatisfied judgments or decisions against it from any state or federal agency or court which involve customer service or rates, which action, judgment, or decision has occurred within three years of the date of the application; and (6) A statement that no annual report or assessment fees are overdue.

The Commission will require Metrocall to file a supplemental pleading that supplies the information requested above.

IT IS THEREFORE ORDERED:

1. That Metrocall, Inc., must file, no later than November 8, 2002, a supplemental pleading in compliance with this order.

2. That this order will become effective on November 8, 2002.

BY THE COMMISSION

Dale Hardy Roberts
Secretary/Chief Regulatory Law Judge

(S E A L)

Bill Hopkins, Senior Regulatory Law Judge,
by delegation of authority under
Section 386.240, RSMo 2000,
as currently supplemented.

Dated at Jefferson City, Missouri,
on this 29th day of October, 2002.



STATE OF MISSOURI



Rebecca McDowell Cook
Secretary of State

CORPORATION DIVISION - CERTIFICATE OF AUTHORITY

WHEREAS,
METROCALL, INC.

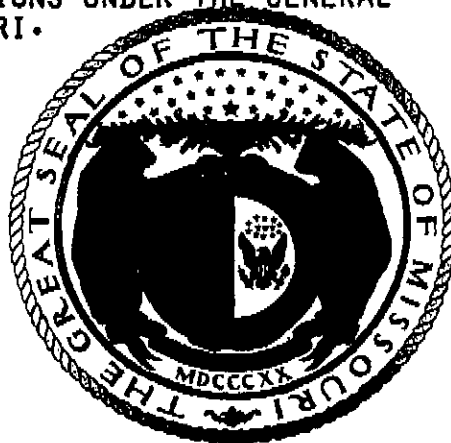
USING IN MISSOURI THE NAME
METROCALL, INC.

HAS COMPLIED WITH THE GENERAL AND BUSINESS CORPORATION LAW WHICH GOVERNS FOREIGN CORPORATIONS; BY FILING IN THE OFFICE OF THE SECRETARY OF STATE OF MISSOURI AUTHENTICATED EVIDENCE OF ITS INCORPORATION AND GOOD STANDING UNDER THE LAWS OF THE STATE OF DELAWARE.

NOW, THEREFORE, I, REBECCA MCDOWELL COOK, SECRETARY OF STATE OF THE STATE OF MISSOURI, DO HEREBY CERTIFY THAT SAID CORPORATION IS FROM THIS DATE DULY AUTHORIZED TO TRANSACT BUSINESS IN THIS STATE, AND IS ENTITLED TO ALL RIGHTS AND PRIVILEGES GRANTED TO FOREIGN CORPORATIONS UNDER THE GENERAL AND BUSINESS CORPORATION LAW OF MISSOURI.

IN TESTIMONY WHEREOF, I HAVE SET MY HAND AND IMPRINTED THE GREAT SEAL OF THE STATE OF MISSOURI, ON THIS, THE 5TH DAY OF MARCH, 1999.

Rebecca McDowell Cook
Secretary of State



\$155.00



STATEMENT OF KENNETH GOLDSTEIN

I, Kenneth Goldstein, Senior Vice President of Engineering for Metrocall, Inc. ("Metrocall"), and in compliance with Missouri Public Service Commission Rule 4 CSR 240-2.060(1), hereby state, under penalty of perjury, as follows:

1. Metrocall has no pending action or final unsatisfied judgments or decisions against it from any state or federal agency or court which involve customer service or rates, which action, judgment, or decision has occurred within three years of the application for approval of an interconnection agreement with Southwestern Bell Telephone Company (Case No. IK-2003-0158), except that some outstanding subscriber issues remain in relation to Metrocall's Chapter 11 bankruptcy filing; Metrocall's plan of reorganization was confirmed by the U.S. Bankruptcy Court on October 8, 2002; and
2. Metrocall has no annual report or assessment fees that are overdue.


Kenneth Goldstein

DATE: November 7, 2002

CERTIFICATE OF SERVICE

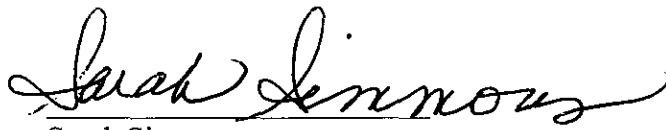
I, Sarah Simmons, an employee of Alston & Bird LLP, hereby certify that on this 7th day of November 2002, true and complete copies of the foregoing Supplemental Pleading in Response to Order Directing Filings were served, via First-Class Mail, postage prepaid, on the following individuals:

Dana K. Joyce
P.O. Box 360
206 Madison Street, Suite 800
Jefferson City, MO 65102

John B. Coffman
P.O. Box 7800
200 Madison Street, Suite 640
Jefferson City, MO 65102

Melvin Flowers
Lead Negotiator
SBC/Industry Markets
350 N. Orleans
Chicago, IL 60654

Tim Judge
Southwestern Bell Telephone Co. -- ILEC
101 W. High St.
Jefferson City, MO 65109

A handwritten signature in black ink, reading "Sarah Simmons", with a stylized flourish at the end.

Sarah Simmons