



**GTE Service
Corporation**

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July 21, 2000

FILED

JUL 21 2000

**Missouri Public
Service Commission**

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

Subject: TC-2000-767

Dear Mr. Roberts:

**Enclosed are the original and 8 copies of GTE Midwest Incorporated's Motion for
Reconsideration and Request for Staff Investigation in the above referenced case.**

Thank you for your assistance in this matter.

Sincerely,

Tracy Pagliara

gl

Enclosures

c: Service List

BEFORE THE PUBLIC SERVICE COMMISSION
FOR THE STATE OF MISSOURI

FILED

JUL 21 2000

Missouri Public
Service Commission

Stone County Emergency Services,)
)
Complainant,)
)
v.)
)
GTE Midwest Incorporated and)
Southwestern Bell Telephone Company,)
)
Respondents.)

Case No.: TC-2000-767

GTE MIDWEST INCORPORATED'S
MOTION FOR RECONSIDERATION AND
REQUEST FOR STAFF INVESTIGATION

GTE Midwest Incorporated ("GTE")¹ submits the following Motion for Reconsideration and Request for Staff Investigation, and in support thereof states:

1. On June 22, 2000, GTE filed its Answer, Motion to Dismiss and Alternative Request for Mediation, in response to the complaint filed by the Stone County Emergency Services Board ("complainant"). In that pleading, GTE moved the Commission for dismissal of the allegations in paragraphs 2(a), 2(c) and 2(d) of the complaint on the basis that the issues had been resolved between GTE and the complainant. In support of its request for dismissal, GTE submitted three letters between GTE and the complainant (Exhibits A, B and C), demonstrating that GTE had resolved all issues relating to the 911 database to the satisfaction of the complainant. GTE also responded that it expected to resolve the issues in paragraph 2(b) of the complaint shortly. In the alternative, GTE requested mediation of any outstanding issues.

2. On June 23, 2000, the Commission issued an order directing complainant,

¹ GTE has filed for expedited approval of its request for a name change to GTE Midwest Incorporated d/b/a Verizon Midwest. GTE expects to begin using the name Verizon Midwest on August 1, 2000.

Southwestern Bell Telephone Company and the Office of Public Counsel to respond to GTE's request for mediation, which they later did. However, the Commission's June 23 order did not address GTE's Motion to Dismiss the complaint. Accordingly, GTE now requests that the Commission reconsider its Motion to Dismiss the complaint and issue an order granting that motion.

3. In the alternative, and at a minimum, GTE requests that the Commission issue an order directing the staff to conduct an investigation as to the cause of the complaint and file a report of its findings, pursuant to 4 CSR 240-2.070(10). GTE believes that it makes sense for the Commission to order such an investigation at the outset of this complaint proceeding, so that the parties may potentially avoid some of the time and expense of litigation.

WHEREFORE, GTE respectfully requests that the Commission dismiss this complaint and, in the alternative, that the Commission issue an order directing the staff to conduct an investigation as to the cause of the complaint and file a report of its findings. GTE also requests that the Commission grant any further relief that it deems just and proper.

Respectfully submitted,

GTE MIDWEST INCORPORATED

By: 

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ATTORNEY FOR GTE MIDWEST INCORPORATED

CERTIFICATE OF SERVICE

Copies of this document were served on the following parties by first-class, postage prepaid, U.S. Mail on July 21, 2000.



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