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July 28, 2000

FILED²

JUL 28 2000

Missouri Public
Service Commission

Mr. Dale Hardy Roberts
Secretary/Chief Regulatory Law Judge
Missouri Public Service Commission
P.O. Box 360
Jefferson City, Missouri 65102-0360

Re: Stone County Emergency Services v. GTE Midwest Incorporated and Southwestern
Bell Telephone Company.

Dear Mr. Roberts:


Enclosed for filing in the above referenced matter, please find the following:

1. Motion for Leave to Amend Complaint by Interlineation; and
2. Complainant's Response to GTE's Motion for Reconsideration and Request for Staff Investigation.

Please contact me with any questions. Thank you.

Very truly yours,

GIBBS LAW OFFICE, P.C.



Scott R. Pool
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SRP:ch

Enclosure

cc: Mark Rundel
Tracy Pagliara
Mimi B. MacDonald
Michael F. Dandino
Dana K. Joyce
Malcome Vedane

BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI

FILED²

JUL 28 2000

Missouri Public
Service Commission

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

Case No.: TC-2000-767

MOTION FOR LEAVE TO AMEND COMPLAINT BY INTERLINEATION

COMES NOW, Complainant, Stone County Emergency Services, by and through its attorneys, Gibbs Law Office, P.C., and pursuant to 4 CSR 240-2.080(21), respectfully requests leave of this Commission to amend its Complaint by interlineation. For its cause, Complainant respectfully states to this Commission as follows:

1. This Complaint was filed by attorney Mark Rundel on or about May 17, 2000. A responsive pleading has been filed by GTE Midwest Incorporated (hereinafter referred to as "GTE"), on or about June 22, 2000. A responsive pleading has been filed by Southwestern Bell Telephone Company (hereinafter referred to as "SWB"), on or about June 23, 2000.

2. Therefore, pursuant to 4 CSR 240-2.080(21), leave of the Commission is necessary for this interlineation.

3. The requested interlineation regards a typographical error and does not create any new issues or controversies between the parties.

4. No party should incur any prejudice as a result of this requested relief.

5. Plaintiff respectfully requests to amend by interlineation paragraph 2(a) of its previously filed Complaint, which reads as follows: "As a basis of this Complaint, Complainant

states the following facts: a) GTE and SWB failed to provide 911 services to certain customers of GTE in Stone County, Missouri.”

6. The proposed interlineation reads: As a basis of this Complaint, Complainant states the following facts: a) GTE and SWB failed to provide 911 services to certain customers of GTE and SWB in Stone County Missouri.

7. A corrected Complaint is attached hereto and incorporated herein by reference.

WHEREFORE, Complainant respectfully requests to this Commission that it be granted leave to Amend its Complaint by interlineation and that this Commission accept the attached corrected Complaint in this matter, and for any further relief this Commission may deem necessary and proper under the circumstance.

Respectfully submitted,

GIBBS LAW OFFICE, P.C.



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Attorneys for Complainant.

CERTIFICATE OF SERVICE

I hereby certify that I served a copy of the foregoing document by mailing and faxing a true copy thereof on this 28th Day of July, 2000, to the following:

Ms. Tracy D. Pagliara
601 Monroe Street, Suite 304
Jefferson City, Missouri 65101

Ms. Mimi B. MacDonald
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