

CROUCH & FAIN

Attorney at Law

PO Box 434

141-B Main Street

Forsyth, Missouri 65653

(417)546-3942 telephone

(417)546-5105 facsimile

James Clifford Crouch, 1948-1998
Charles J. Fain

Julie Coleman, Legal Secretary
Beth Moore, Legal Secretary

Secretary

MISSOURI PUBLIC SERVICE COMMISSION
200 Madison Street
Jefferson City, Missouri 65102

TC-2002-493

Dear Secretary:

FILED⁴

APR 25 2002

Missouri Public
Service Commission

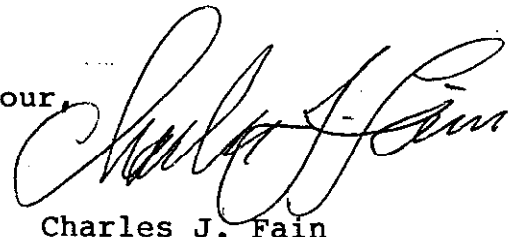
Enclosed is the original and 8 copies Kanakuk Kamps is filing against Verizon Communications, our local phone company whose home address is somewhere in Texas.

Please file and set this matter for hearing and we request the hearing be held in the Branson, Missouri area where the Kanakuk facilities are located.

Also enclosed is a self addressed return envelope with postage to rereturn a copy to me.

If you need additional information before filing, please call me.

Sincerely yours,



Charles J. Fain

MISSOURI PUBLIC SERVICE COMMISSION

Jefferson City, Missouri

KANAKUK KAMPS, Inc.

vs.

vs.

VERIZON COMMUNICATIONS,

a Texas phone Co.

Case No. TC-2002-493

FILED⁴

APR 25 2002

COMPLAINT

Missouri Public
Service Commission

COMES NOW, the Complainant, a private company, by its attorney of record, Charles J. Fain a Missouri licensed attorney, Missouri Bar Number 14830, and for Complaint against Verizon Communications, a Texas phone company operating in Missouri under the regulation of the Missouri Public Service Commission, and for its COMPLAINT against said phone company alleges and states:

1. The Complainant is a private operating company located at Branson, Taney County, Missouri where it owns and operates a private camp for boys on the shores of and adjoining to, Lake Taneycomo an impoundment on White River and well known as a vacation and tourist area.

2. For many years the Complainant, hereinafter called Kanakuk Kamps, has owned and operated a camp for boys on the shores of Lake Taneycomo, a nationally known impoundment of the waters of White River. Its facilities consist of cabins, dwellings, offices, play areas care for hundreds of young people who comes from throughout the midwest.

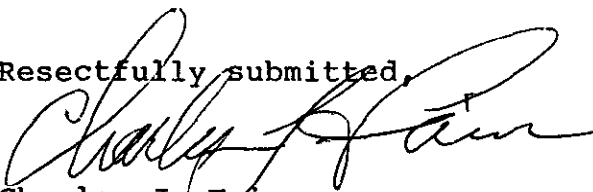
3. To carry on the extensive communications it must have throughout the midwest it is in need of extensive and unique telephone service which it can only obtain from Verizon Communications, the only public telephone system in the Taney County, Missouri area.

4. A request for a certain block of numbers was requested of the phone company but these have been denied. Attached hereto as Exhibit A is a copy of a letter request from Kanakuk to the phone company but this request has been denied. It is essential to Kanakuk business that these specific and special numbers be assigned to them, yet Kanakuk has been denied such.

5. Kanakuk requests this entire matter of the refusal for the specific services be set for hearing before this commission and that the hearing be held in the Branson, Missouri area.

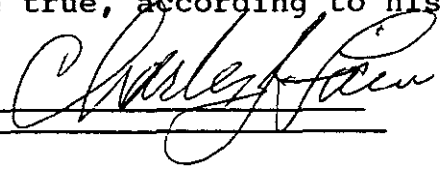
A copy of this Complaint and request for hearing is being forwarded to the phone company.

Respectfully submitted,


Charles J. Fain,
Attorney for the Complainant,
P. O. Box 434, Forsyth, MO 65653

STATE OF MISSOURI ,
County of Taney)

Charles J. Fain, states that he is attorney for the Complainant and the facts stated above are true, according to his best information and belief.


Subscribed and sworn to before me this

23 day of April, 2002.




NOTARY PUBLIC



EX. A

Monday, March 04, 2002

Ms. Cathy Finney
Verizon Telecommunications

Dear Ms. Finney:

Mr. Jeff Schneider, Director of Information Systems at Kanakuk Kamps has brought to my attention a situation that materially affects our right to conduct business with the current technology determined best for the present and the future. Kanakuk Kamps has enjoyed a successful relationship with Verizon, GTE of Missouri, Contel, Contentinal of Missouri and others for much of our 76 years of operation in the area.

The following abstract of various E-mail and fax communications confirms the request for specific service and the your denial of these services.

1. Feb. 18, 2002 - 5:29 P.M. = Kanakuk Kamps initial formal request to our Verizon Account Manager Ms. Tricia Murray.
2. Feb. 21, 2002 - 1: 53 P.M. = Verizon's statement of non-availability of numbers to meet Kanakuk Kamps request.
3. Feb. 21, 2002 - 3:44 P.M. = Kanakuk Kamps clarifying of our need for 4 each blocks of 500 numbers.
4. Feb. 26, 2002 - 2:07 P.M. = Verizon's response with a list of available numbers that may be assigned. (Note that Kanakuk Kamps is the largest Christian Athletic Camping system in the world and that Verizon's response with the first, of 1850 numbers is 0666, which as told in the Book of Revelations is the "Mark of the Beast". We trust and wish to believe this is purely coincidental and not intentional.
5. Feb. 27, 2002 - 12:46 = Kanakuk Kamps rejection, as unacceptable, the numbers offered to Kanakuk Kamps.
6. Mar. 04, 2002 - 2:45 P.M. = Kanakuk Kamps Fax of a detailed rejection of the inadequate services Verizon has offered.

The above communications demonstrated that Kanakuk Kamps has clearly and specifically requested services and that Verizon has denied said services. Would you please clearly and specifically explain why our request is denied.

Very truly yours,

Patrick M. Barnett
Property Administrator

patb@kanakuk.com // voice: 417) 336.6599 ext 269 // fax: 417) 239-3269