

WILLIAM D. STEINMEIER, P.C.

2031 TOWER DRIVE

JEFFERSON CITY, MISSOURI (MO) 65109

WILLIAM D. STEINMEIER
ATTORNEY AT LAW
GOVERNMENTAL CONSULTANT
(573) 659-8672
FAX (573) 636-2305

MAILING ADDRESS:
POST OFFICE BOX 104595
JEFFERSON CITY, MISSOURI (MO)
65110-4595

MARY ANN YOUNG
ATTORNEY AT LAW
OF COUNSEL
(573) 634-8109
FAX (573) 634-8224

April 4, 2003

FILED²

APR 04 2003

Missouri Public
Service Commission

Missouri Public Service Commission
Attn: Secretary of the Commission
200 Madison Street, Suite 100
P. O. Box 360
Jefferson City, MO 65102-0360

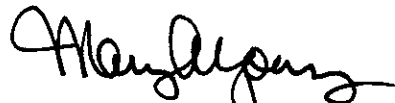
RE: Case No. _____, Tariff File No. YC-2003-1764
The Pager Company d/b/a The Pager & Phone Company
Motion for Expedited Treatment to Approve Basic Local Service Tariff Sheet on
Less Than Thirty Days Notice

Dear Secretary:

Enclosed please find an original and five copies of the Motion For Expedited Treatment to Approve Basic Local Service Tariff Sheets Filed in Compliance With a Commission Order of The Pager Company d/b/a The Pager & Phone Company (PagerCo), for filing with the Commission.

Thank you for assistance in processing this filing. Copies are being served on the General Counsel and Public Counsel. Please contact me at 634-8109 or by email at myoung0654@aol.com if there are any questions.

Sincerely,



Mary Ann (Garr) Young

Enclosures

cc: General Counsel
Office of Public Counsel
Dale Schmick, The Pager Company
Chris Malish, Foster & Malish

FILED²

APR 04 2003

BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI

Missouri Public
Service Commission

In the Matter of the Motion of)
The Pager Company dba)
The Pager & Phone Company)
for Expedited Treatment of)
Basic Local Service Tariff Sheets)

Case No. _____
Tariff Tracking No. YC-2003-1764

MOTION FOR EXPEDITED TREATMENT TO APPROVE
BASIC LOCAL SERVICE TARIFF SHEETS
FILED IN COMPLIANCE WITH A COMMISSION ORDER

COMES NOW The Pager Company dba The Pager & Phone Company (PagerCo), by and through counsel and, pursuant to 4 CSR 240-2.080(16), files its Motion for Expedited Treatment to Approve Basic Local Service Tariff Sheets ("Motion"). This Motion is in reference to the basic local service tariff sheets filed April 4, 2003, designated as Tracking No. YC-2003-1764, requesting approval of revisions to PagerCo's basic local exchange service tariff to remove language which precludes Lifeline and LinkUp customers from subscribing to PagerCo's UNE-P based service, PhonePLUS. The tariff revisions are filed in compliance with the Commission's March 28, 2003, Order Granting Designation as an Eligible Carrier Under Section 254 of the Telecommunications Act of 1996 and Approving Stipulation and Agreement (Order). The tariffs were filed with a 30-day effective date of May 4, 2003. PagerCo requests the tariff pages be allowed to take effect concurrently with the effective date of the Order, April 11, 2003, or as soon thereafter as it is possible for the Staff and Commission to review the proposed tariff revisions. In support of this Motion, PagerCo respectfully states as follows:

1. On April 1, 2003, in Case No. CO-2003-0094, the Commission granted PagerCo designation as an eligible carrier (ETC). Ordered 3. provided "That The Pager

Company, d/b/a The Pager & Phone Company, shall file tariff revisions to its basic local tariff to remove the language which precludes Lifeline customers from subscribing to the UNE-P based service, known at PhonePLUS." Ordered 5. provided "That the Pager Company d/b/a The Pager & Phone Company, shall advertise the availability of Lifeline service in the exchanges listed in paragraph 1 using media of general distribution, and in compliance with the quantity and content of advertising filed as Exhibits B and C to its November 8, 2002 Amended Application."

2. On April 4, 2003, PagerCo filed the following revised tariff sheets in compliance with the Order: Fourth Revised Page 32, Second Revised Page 32.1, and Second Revised Page 32.2. These proposed revisions remove the language precluding Lifeline customers from subscribing to UNE-P based PhonePLUS service. In addition, the revisions will remove the language precluding application of LinkUp discounts to UNE-P based PhonePLUS service, and provide for waiver of the administrative change charge for lifeline customers who switch from resale-based Basic Prepaid Service to UNE-P based PhonePLUS Prepaid Service, consistent with the terms of the Stipulation and Agreement in Case No. CO-2003-0094. No other revisions are made in these proposed revised tariff sheets.

3. PagerCo is prepared to advertise the availability of lifeline and LinkUp services to customers who wish to subscribe to UNE-P based PhonePLUS service in the exchanges for which ETC designation has been granted (namely, Ash Grove, Camdenton, Carl Junction, Clever, Excelsior Springs, Grain Valley, Harrisonville, Kansas City MCA Metro, Richmond, Sedalia, Smithville, Springfield MCA and St. Joseph exchanges). PagerCo will

offer to switch current lifeline customers on PagerCo's Basic Prepaid Service to PhonePLUS service at no cost to the customer. PagerCo is anxious to make lifeline service, as well as LinkUp discounts, available to interested customers on a UNE-P basis as soon as possible. In light of the circumstances, PagerCo respectfully requests that the Commission grant this motion for expedited treatment.

4. Pursuant to 4 CSR 240-2.080(16)(B), the benefits which will accrue from the expedited consideration of these tariff revisions is that PagerCo will be able to bring the benefits of UNE-P service to current and prospective lifeline customers and compliance with the Commission's Order will be achieved as quickly as possible. Pursuant to the terms of the Stipulation and Agreement filed in this case on February 28, 2003, upon approval of these tariff revisions, PagerCo will offer to transition current lifeline customers to its PhonePLUS UNE-P based service without assessing its administrative change charge for the change in service. PagerCo is not aware of any potential negative effect on PagerCo's customers or the general public, if the Commission acts on this request in an expedited manner.

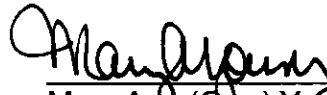
5. This Motion is being filed on the same date as the proposed tariff revisions. Thus, pursuant to 4 CSR 240-2.080(16)(C), this Motion is filed as soon as it could have been.

6. Pursuant to 4 CSR 240-2.080(16)(A), PagerCo requests that the revised basic local service tariff sheets which are the subject of Tracking Number YC-2003-1764 be approved for service on and after April 11, 2003, the effective date of the Commission's Order. If it is not possible to expedite treatment to this extent, PagerCo requests the tariff

be permitted to take effect as soon thereafter as the Staff can review and make its recommendation to the Commission and the Commission can process and approve the proposed tariff sheets.

WHEREFORE, PagerCo hereby respectfully requests that the Commission grant this Motion for Expedited Treatment and approve the basic local service tariff revisions described herein to take effect on April 11, 2003, or as soon thereafter as it is possible for the Commission to review and approve the tariff revisions.

Respectfully submitted,




Mary Ann (Garr) Young (MO Bar #27951)
WILLIAM D. STEINMEIER, P.C.
P.O. Box 104595
2031 Tower Drive
Jefferson City, MO 65110-4595
Phone: (573) 634-8109
Fax: (573) 634-8224 (Fax)
Email: myoung0654@aol.com

Counsel for The Pager Company d/b/a
The Pager & Phone Company

CERTIFICATE OF SERVICE

I hereby certify that a copy of this document has been hand delivered or mailed by first class mail, postage prepaid to the Office of Public Counsel and the General Counsel's office on this 4th day of April 2003.


Mary Ann (Garr) Young