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

January 23, 2003

FILE []³
JAN 2 3 2003

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

Missouri Public Service Commission

RE: Case No.

, Tariff File No. JC-2003-1357

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

Motion for Expedited Treatment to Approve Revised 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 Revised Basic Local Service Tariff Sheet on Less Than Thirty Days Notice 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



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)	Case No.
for Expedited Treatment to Approve)	Tariff File No. JC-2003-1357
Revised Basic Local Service Tariff Sheet)	
on Less Than Thirty Days Notice	j	

MOTION FOR EXPEDITED TREATMENT TO APPROVE BASIC LOCAL SERVICE TARIFF SHEET ON LESS THAN THIRTY DAYS NOTICE

COMES NOW The Pager Company dba The Pager & Phone Company (PagerCo), by and through counsel and pursuant to 4 CSR 240-2.065 (2) and 4 CSR 240-2.080(16), and files its Motion for Expedited Treatment to Approve Tariff Sheet on Less Than Thirty Days Notice ("Motion"). This Motion is in reference to Tariff File No. JC-2003-1357, and more specifically only applies to MO P.S.C. No. 1, Fourth Revised Page 8, which was filed January 21, 2003 with an effective date of February 21, 2003. PagerCo requests this tariff page be allowed to take effect on February 2, 2003. In support of this Motion, PagerCo respectfully states as follows:

- 1. On January 21, 2003, PagerCo filed basic local tariff revisions, including MO P.S.C. No. 1, Fourth Revised Page 8. The tariff was filed with a 30-day effective date per Section 392.220 RSMo. The tariff filing was assigned Tariff File JC-2003-1357. PagerCo herein requests that Fourth Revised Page 8 in Tariff File JC-2003-1357 be allowed to take effect on February 2, 2003, or as soon thereafter as the Commission can process and approve the revised tariff sheet.
- 2. The proposed revision to Fourth Revised Page 8 is to add text to the definition of Administrative Change Charge (ACC) so that the ACC will apply to additional situations

where changes to the customer's service require an order to be placed with the underlying service provider (ILEC), thereby incurring a charge to PagerCo from the ILEC. This additional language is necessary because without it PagerCo will not be able to recover costs related to changes in PagerCo customers' services which must be paid to the ILEC.

3. Today, January 23, 2003, the Commission approved PagerCo's initial interexchange (IXC) service tariff effective February 2,2003, in Case No. XA-2003-0118. The IXC tariff was filed in compliance with the Commission's Order Approving Interexchange Certificate of Service Authority, issued November 5, 2002, in Case No. XA-2003-0118. Approval of PagerCo's IXC tariff was a necessary corollary to institution of PagerCo's UNE-P based basic local service, called PHONEPLUS. Rates, terms and conditions for PHONEPLUS service were recently added to PagerCo's basic local service tariff in Tariff File JC-2003-1255, effective January 18, 2003. After the PHONEPLUS tariff revisions were approved, PagerCo discovered that the definition of Administrative Change Charge in its basic local tariff was faulty and did not appear to permit recovery of charges that would be incurred by PagerCo from its underlying carrier(s) in certain circumstances. The urgency for approval of the revision to Page 8 is that with today's approval of PagerCo's IXC tariff and the Commission's recent approval of PagerCo's PHONEPLUS service, PagerCo is prepared to roll out its UNE-P based service on and after February 2, but must be able to recover the ACC in order to transfer existing customers from resalebased service to UNE-P service. The harm that will be avoided by allowing this tariff revision to take effect in less than 30 days is that PagerCo will be able to convert current Basic Prepaid Service customers to PHONEPLUS service, which will provide optional features at lower cost to those customers, without unreimbursed costs to PagerCo.

4. This Motion is being filed as soon as possible after the tariff revision was filed and the urgency for implementation of the tariff revision was discovered.

WHEREFORE, PagerCo hereby respectfully requests that the Commission approve MO P.S.C. No. 1, Fourth Revised Page 8, on less than thirty days notice pursuant to 4 CSR 240-2.065(2). PagerCo requests that Fourth Revised Page 8 be approved for service on and after February 2, or as soon thereafter as it is possible for the Commission to review and approve the tariff page.

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 dba 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 23rd day of January 2003.

Mary Ann (Garr) Young