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OF COUNSEL
RICHARD T. CIOTTON

June 7, 2002

Mr. Dale Hardy Roberts
Missouri Public Service Commission
P.O. Box 360
Jefferson City, MO 65102

Re: TC-2002-349

Dear Mr. Roberts:

Enclosed for filing on behalf of Spectra Communications Group, LLC d/b/a CenturyTel ("Spectra"), please find an original and eight (8) copies of a Response of Spectra Communications Group, LLC d/b/a CenturyTel to Order to Show Cause and Answer to Consumer Complaint.

Would you please see that this filing is brought to the attention of the appropriate Commission personnel.

I thank you in advance for your cooperation in this matter.

Sincerely yours,

BRYDON, SWEARENGEN & ENGLAND P.C.

By:



Sondra B. Morgan

SBM/lar
Enclosure

cc: General Counsel
Michael F. Dandino
Frances Langerud
Carolyn Hall

**BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI**

Frances Langerud,	)	
	)	
Complainant,	)	
	)	
v.	)	Case No. TC-2002-349
	)	
CenturyTel,	)	
	)	
Respondent.	)	

**RESPONSE OF SPECTRA COMMUNICATIONS GROUP, LLC
d/b/a CENTURYTEL TO ORDER TO SHOW CAUSE AND
ANSWER TO CONSUMER COMPLAINT**

Comes now Spectra Communications Group, LLC d/b/a CenturyTel ("CenturyTel") and for its Response to Order to Show Cause and Answer to Consumer Complaint states to the Missouri Public Service Commission ("Commission") as follows:

Order to Show Cause

1. On June 4, 2002, counsel for CenturyTel discovered through a review of the Commission's Web-based orders that the Commission had issued an Order to Show Cause to CenturyTel based on the company's failure to respond to a Notice of Complaint issued January 29, 2002. Before June 4, neither CenturyTel nor its counsel was aware of the consumer complaint that is the basis of this case. A review of the Order to Show Cause and the Notice of Complaint shows that both the Notice and the Order to Show Cause were directed to the company's previous address at 8800 Blue Ridge Parkway, Suite 100, Kansas City, Missouri 64138. CenturyTel's current address is 9200 Ward Parkway, Suite 600, Kansas City, Missouri

64114. The Commission was notified of this change of address by letter on July 20, 2001.¹

Because the Notice of Complaint was sent to the wrong address, CenturyTel was unaware of the complaint or the Commission's Notice and was unable to respond in a timely fashion.²

CenturyTel therefore has shown good cause why a timely answer to the Commission's Notice of Complaint was not filed.

Answer to Complaint

2. On January 19, 2002, Ms. Frances Langerud filed a Complaint with the Commission in which she disputed the late charges which had been assessed on her billing statement prior to the 31st past due day. She attached copies of her billing statements for September, October and November of 2001 and January of 2002. Ms. Langerud disputed the \$1.20 late fee assessed on these statements as well as the fact that her bill was considered past due in less than thirty (30) days. As was stated above, CenturyTel was only made aware of this complaint on June 4, but after review of the complaint and researching the customer's account, CenturyTel offers the following explanation and proposed resolution.

After review of Ms. Langerud's account, CenturyTel found that Ms. Langerud should not have been charged the late fee. Ms. Langerud was only charged the late fee for the four months listed above for a total amount of \$4.80. CenturyTel has issued a credit for this amount to Ms. Langerud as well as a \$25.00 courtesy credit for any inconvenience this has caused. Ms.

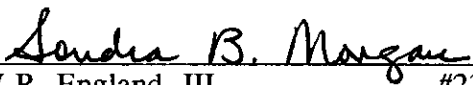
¹A copy of that letter is marked Exhibit A and attached to this pleading. A second letter was faxed to the Data Center on June 5, 2002, and it is also attached. It is our understanding that the Data Center has the correct address for CenturyTel in its system.

²The Commission's file does not contain any return receipt for the registered mail sent to CenturyTel at the wrong address.

Langerud has been contacted by phone by a Customer Service representative, and a copy of the letter sent to Ms. Langerud by Toni Conway, CenturyTel's Quality Assurance Analyst, is attached as Exhibit B.

For all the reasons stated above, CenturyTel respectfully requests that the Commission accept its Response to the Order to Show Cause, accept its Answer to Consumer Complaint and dismiss the Complaint.

Respectfully submitted,


W.R. England, III #23975
Sondra B. Morgan #35482
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(573) 635-7166
(573) 635-0427 (fax)
smorgan@brydonlaw.com (email)

Attorneys for Spectra Communications Group,
LLC d/b/a CenturyTel

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the above and foregoing document was sent by U.S. Mail, postage prepaid, or hand-delivered on this 7th day of June, 2002, to the following parties:

General Counsel
Missouri Public Service Commission
P.O. Box 360
Jefferson City, MO 65102

Michael F. Dandino
Office of Public Counsel
P.O. Box 7800
Jefferson City, MO 65102

Frances Langerud
23009 Rt. AA
Paris, MO 65275


Sondra B. Morgan

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OF COUNSEL
RICHARD T. CIOTTONE

July 20, 2001

Ms. Nila Hagemeyer
Records Department
Missouri Public Service Commission
P.O. Box 360
Jefferson City, MO 65102

Re: Change of address for Spectra Communications Group, LLC

Dear Nila:

Spectra Communications Group, LLC d/b/a CenturyTel has moved its offices to 9200 Ward Parkway, Suite 600, Kansas City, Missouri 64114. Its phone and fax numbers remain the same, (816) 779-8100 and (816) 770-8200 respectively. Would you please change your records to reflect this change of address and notify any other parties at the Commission who should be made aware of this change?

Please call me if you have any questions.

Sincerely,

BRYDON, SWEARENGEN & ENGLAND P.C.

By: 
Sondra B. Morgan

cc: Office of Public Counsel
RLJ Lewis Mills
Ken Matzdorff

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OF COUNSEL
RICHARD T. CIOTONE

June 5, 2002

VIA FACSIMILE (573)522-6176

Data Center
Missouri Public Service Commission
P.O. Box 360
Jefferson City, Mo 65102

Re: Correct address of Spectra Communications Group, LLC d/b/a CenturyTel

To whom it may concern:

On July 20, 2001, Spectra Communications Group, LLC d/b/a CenturyTel notified the Commission of its change of address to 9200 Ward Parkway, Suite 600, Kansas City, Missouri 64114. A copy of that notification is attached.

Despite this notification, recently two separate Notices of Complaint from the Commission (Case Nos. TC-2002-349 and TC-2002-1100) have been sent to Spectra at its former address of 8800 Blue Ridge Boulevard. Although counsel for Spectra was provided a copy of the complaint in Case No. TC-2002-1100, neither the company nor counsel was aware of the complaint in Case No. TC-2002-349 until the Commission issued an Order to Show Cause.

Would you please make sure that all Commission personnel are aware of this change of address so that we can avoid future problems with notice to the company? Thank you for your assistance and cooperation.

Sincerely,

BRYDON, SWEARENGEN & ENGLAND P.C.

By:



Sondra B. Morgan

SBM
cc: Office of Public Counsel
Dale Hardy Roberts
Carolyn Hall

FAXED
6/5

June 7, 2002

Ms. Frances Langerud
23009 Route AA
Paris, MO 65275-2483

Dear Ms. Langerud:

Thank you for the opportunity to discuss your billing issues. CenturyTel strives to provide prompt, professional and courteous customer service. I certainly regret you feel you did not receive such attention from our company. As stated during our telephone conversation today, this matter will be brought to the attention of the Customer Service center management and dealt with accordingly.

As I apologized today, CenturyTel did not receive your original complaint with the PSC and was only made aware of your formal complaint with the Missouri PSC on June 4, 2002. The formal complaint disputes late fee charges which were assessed on your CenturyTel billing statement prior to the 31 day pay due date. You submitted copies of your September, October, November 2001 and January 2002 bills to the PSC with handwritten notes disputing the due dates and the \$1.20 charge on each of these months. We regret that you were charged these fees in error, and have issued a credit to your account in the amount of \$4.80 for all late fees charged.

CenturyTel is also issuing you a \$25.00 credit for all the inconvenience you have had in order to get this matter rectified.

Again, let me apologize on behalf of CenturyTel for the way this matter was handled. As stated earlier during our conversation, you have my toll free number and can call me if you have any additional problems or questions with your service.

Sincerely,

Toni Conway
Quality Assurance Analyst
CenturyTel Headquarters

Exhibit B