## BEFORE THE PUBLIC SERVICE COMMISSION STATE OF MISSOURI

In the matter of the Joint Application of New Florence Telephone Company, Tiger Telephone, Inc. and Direct Communications Rockland, Inc. for an order authorizing Direct Communications Rockland, Inc. to purchase or acquire, take or hold all of the issued and outstanding capital stock of Tiger Telephone, Inc.

Case No. TO-2007-0139

## RESPONSE OF JOINT APPLICANTS TO STAFF'S RECOMMENDATION AND REQUEST FOR EXPEDITED ORDER

)

) )

)

)

Come now New Florence Telephone Company ("New Florence"), Tiger Telephone, Inc. ("TigerTel") and Direct Communications Rockland, Inc. and the individuals designated by Direct, ("DCR") (collectively referred to as "Joint Applicants") and file this Response to Staff's Recommendation and Request for an Expedited Order. Joint Applicants state to the Missouri Public Service Commission ("Commission") as follows:

 Joint Applicants filed an Application with the Commission on October 2, 2006, requesting authority for DCR to acquire the stock of TigerTel. On January 17, 2007, Joint Applicants filed an Amended and Supplemental Application seeking approval for New Florence to give a guaranty and place a lien on its assets as security for a loan to TigerTel. On February 16, 2007, Joint Applicants filed a Second Amended Application seeking approval for individuals designated by DCR to acquire the stock of TigerTel.

2. On February 26, 2007, the Staff filed its Recommendation recommending that the proposed transaction be approved subject to certain conditions. Joint Applicants do not intend to contest any of the conditions or recommendations listed by the Staff in its Recommendation.

3. Joint Applicants have been apprised that the Section 214 application filed with the Federal Communications Commission ("FCC") seeking a transfer of control has been accepted for filing as a streamlined application as of March 2, 2007. If no unfavorable comments are received, Joint Applicants will receive permission from the FCC to transfer the stock and related control on the 30<sup>th</sup> day after the date of the Notice. Joint Applicants would like to tentatively schedule the closing of this transaction on April 2, 2007, effective April 1, 2007. In order to meet this schedule, Joint Applicants will need to receive an order from the Commission by March 21, 2007, with an effective date of March 31, 2007. For this reason, Joint Applicants respectfully request that the Commission expedite its approval of this proposed transaction.

Wherefore, Joint Applicants respectfully request that the Commission accept its Response to Staff's Recommendation and expedite its consideration of this matter so that an order can be issued on or before March 21, 2007.

Respectfully submitted,

W. R. England, III Mo. Bar #23975 Sondra B. Morgan Mo. Bar #35482 BRYDON, SWEARENGEN & ENGLAND, P.C. 312 E. Capitol Avenue P.O. Box 456 Jefferson City, MO 65102 573-635-7166 573-635-0427 (Facsimile) smorgan@brydonlaw.com (e-mail)

Attorneys for Tiger Telephone, Inc., New Florence Telephone Company and Direct Communications Rockland, Inc.

## Certificate of Service

I hereby certify that a true and correct copy of the above and foregoing document was sent electronically, hand-delivered or mailed, United States Mail, postage prepaid, this  $\underline{4}$  and  $\underline{4}$  day of March, 2007, to:

Michael Dandino Senior Counsel Office of Public Counsel P. O. Box 7800 Jefferson City, MO 65102 Robert Franson Senior Counsel Missouri Public Service Commission P. O. Box 360 Jefferson City, MO 65102

Marean

W. R. England III/Sondra B. Morgan