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June 14, 2000

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P. O. Box 360
Jefferson City, MO 65102

FILED²
JUN 14 2000

Missouri Public
Service Commission

RE: Case No. TM-2000-748

Dear Mr. Roberts:

Enclosed for filing in the above-captioned case are an original and eight (8) conformed copies of a **RESPONSE TO ORDER DIRECTING STAFF TO FURTHER RESPOND TO REQUEST FOR EXPEDITED RULING.**

This filing has been mailed or hand-delivered this date to all counsel of record.

Thank you for your attention to this matter.

Sincerely yours,

Robert V. Franson
Assistant General Counsel
(573) 751-6651
(573) 751-9285 (Fax)

RF/dkf
Enclosure
cc: Counsel of Record

BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI

FILED

JUN 14 2000

Missouri Public
Service Commission

In the Matter of the Joint Application of)
Miller Telephone Company and Townes)
Telecommunications, Inc., for an Order)
Authorizing Townes Telecommunications,)
Inc., to Purchase or Acquire, Take or Hold)
All of the Issued and Outstanding Stock of)
Miller Telephone Company)

Case No. TM-2000-748

**RESPONSE TO ORDER DIRECTING STAFF TO FURTHER RESPOND TO REQUEST FOR EXPEDITED
RULING**

COMES NOW the Staff of the Missouri Public Service Commission ("Staff") by and through the Office of the General Counsel and respectfully submits as follows:

1. On May 11, 2000, Miller Telephone Company ("Miller") and Townes Telecommunications, Inc., ("Townes") filed a Joint Application with the Missouri Public Service Commission ("Commission") requesting that the Commission issue an Order authorizing Townes to purchase all of the issued and outstanding capital stock of Miller.

2. The Joint Applicants also filed a Motion to Expedite consideration and approval of this transaction on May 11, 2000.

3. On June 2, 2000, Staff filed a Response to Request for Expedited Ruling setting forth its reasons for opposing the Motion to Expedite Ruling in this case.

4. On June 7, 2000, the Commission issued an Order Directing Staff to Further Respond to Request for Expedited Ruling

5. Staff has served Data Requests on Counsel for Joint Applicants. Staff has received objections to these Data Requests from Counsel for Joint Applicants and has been and will continue to be in contact with Counsel for Joint Applicants striving to resolve these matters.

6. Staff believes that if these Data Requests were very promptly and fully responded to (on or before June 26, 2000) then Staff could file a recommendation by July 31, 2000.

7. Staff will not be able to adequately review the Joint Application without the information sought in the Data Requests.

WHEREFORE, Staff respectfully requests that the Commission overrule the Motion to Expedite.

Respectfully submitted,

DANA K. JOYCE
General Counsel



Robert V. Franson
Assistant General Counsel
Missouri Bar No. 34643

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Certificate of Service

I hereby certify that copies of the foregoing have been mailed or hand-delivered to all counsel of record as shown on the attached service list this 14th day of June, 2000.



**Service List for
Case No. TM-2000-748
June 14, 2000**

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