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June 2, 2000

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

FILED³

JUN 02 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 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)

RVF:sw
Enclosure
cc: Counsel of Record

BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI

FILED³

JUN 02 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 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. Staff Counsel became aware of the Motion to Expedite on June 2, 2000 and obtained a copy from the Records Department of the Commission. The Commission's General Counsel had not been served with a copy of the Motion to Expedite as required by 4 CSR 240-2.080(19). The Certificate of Service on the Motion to Expedite only shows that the Office of the Public Counsel was served.

4. Joint Applicants have also failed to comply with 4 CSR 240-2.080(17) in that they have not set out with particularity the harm that will be avoided or the benefit that will accrue, and they have not stated the effect on the party 's customers or the general public if the Commission acts by the stated date. They have only stated that they are anxious to complete the transaction by June 30, 2000.

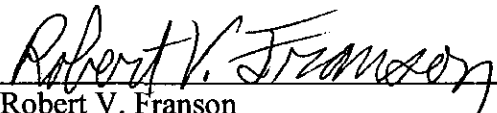
5. Staff has reviewed the Application and opposes the Motion to Expedite for the following reasons:

- a. The Motion fails to comply with 4 CSR 240-2.080(17);
- b. The Intervention period ends June 6, 2000, and Staff does not know if there will be Intervenors or if any issues will be raised by Intervenors; and
- c. As part of its own analysis of the transaction Staff will need to do some discovery.

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

Attorney for the Staff of the
Missouri Public Service Commission
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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 2nd day of June, 2000.

Robert V. Franson

**Service List for
Case No. TM-2000-748
June 2, 2000**

**Office of the Public Counsel
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