BEFORE THE PUBLIC SERVICE COMMISSION OF THE STATE OF MISSOURI

In the Matter of the Joint Application of) Cass County Telephone Company, Limited Partnership, LEC Long Distance,) Inc., d/b/a CassTel Long Distance,) FairPoint Communications, Inc., FairPoint) Communications Missouri, Inc. d/b/a) FairPoint Communications and ST Long Distance. Inc d/b/aFairPoint for) Communications Long Distance Authority to Transfer and Acquire Cass) County Telephone Company, Limited Partnership's and LEC Long Distance, Inc.'s Facilities or Systems Located in the) State of Missouri; 2) for Issuance of) Certificates of Service Authority to) FairPoint Communications Missouri, Inc. d/b/a FairPoint Communications and ST) Long Distance, Inc., d/b/a FairPoint) Communications Long Distance; and 3) to FairPoint Communications Designate) FairPoint Missouri. Inc., d/b/a Communications as а) Telecommunications Carrier Eligible to) Receive Federal Universal Service) Support

Case No. TM-2006-0306

STAFF RESPONSE TO ORDER DIRECTING FILING

COMES NOW the Staff of the Missouri Public Service Commission and for its response states:

1. Cass County Telephone Company, Limited Partnership; LEC Long Distance, Inc.,

d/b/a CassTel Long Distance; FairPoint Communications, Inc.; FairPoint Communications Missouri, Inc., d/b/a FairPoint Communications; and ST Long Distance, Inc., d/b/a FairPoint Communications Long Distance have filed a joint application asking the Commission to approve FairPoint's acquisition of the assets of the CassTel companies. 2. By Order dated March 3, 2006, the Commission directed the Staff to file, no later than March 13, 2006, a pleading advising the Commission when Staff will be able to file its recommendation regarding the joint application.

3. The Staff is awaiting responses to a number of data requests, is making inquiries of other State utility commissions where FairPoint operates, and is reviewing the financial and managerial aspects of the asset purchase agreement. Follow-up data requests may be necessary. Accordingly, the Staff anticipates completing its review and filing its recommendation no later than April 14, 2006. If the Staff's review is completed earlier, the Staff will file its recommendation earlier.

WHEREFORE, the Staff proposes to file its recommendation regarding the joint application no later than April 14, 2006.

Respectfully submitted,

/s/ William K. Haas William K. Haas Deputy General Counsel Missouri Bar No. 28701

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Certificate of Service

I hereby certify that copies of the foregoing have been mailed, hand-delivered, transmitted by facsimile or electronically mailed to all counsel of record this 13th day of March 2006.

<u>/s/ William K. Haas</u> William K. Haas