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September 10, 2002

**FILED<sup>2</sup>**

SEP 10 2002

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

Missouri Public  
Service Commission

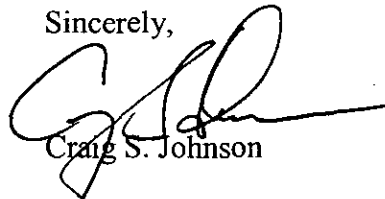
**Re: Mid-Missouri Tel Co v. Southwestern Bell Telephone Company  
Case No. TC-2002-190, Motion to File First Amended Complaint**

Dear Secretary:

Enclosed please find an original and three (3) copies of Mid-Missouri Telephone Company's Motion to File First Amended Complaint, and a copy of that First Amended Complaint. The purpose of the Complaint is chiefly to add subparagraph G to the alternative Requests for relief set forth at the "Wherefore" paragraph at the end of the Complaint. This alternate relief would be in lieu of the request for disconnection of that facility.

Thank you for seeing this filed.

Sincerely,



Craig S. Johnson

CSJ:sw

Enc.

Cc: Keith Krueger  
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Leo Bub

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BEFORE THE  
PUBLIC SERVICE COMMISSION OF MISSOURI

**FILED<sup>2</sup>**  
SEP 10 2002

Missouri Public  
Service Commission

MID-MISSOURI TELEPHONE COMPANY, )

Petitioner, )

vs. )

Case No. TC-2002-190

SOUTHWESTERN BELL TELEPHONE )  
COMPANY, )

Respondent. )

**MOTION FOR LEAVE TO FILE FIRST AMENDED COMPLAINT**

COMES NOW Mid-Missouri Telephone Company and files this Motion for leave to file its First Amended Complaint, a copy of which is attached hereto. The purpose of this amended complaint is to add subparagraph G to the alternative Requests for relief set forth at the "Wherefore" paragraph at the end of the Complaint. This alternate relief would be in lieu of the request for disconnection of that facility. The balance of the complaint is substantially the same as the original complaint.

As the procedural schedule has been suspended, and is there is currently no procedural schedule or hearing date, the granting of this Motion will not delay this proceeding or prejudice the interest of any party..

Wherefore, the basis of the foregoing, Mid-Missouri respectfully request it be granted leave to file the First Amended Complaint herein.

**ANDERECK, EVANS, MILNE,  
PEACE & JOHNSON, L.L.C.**

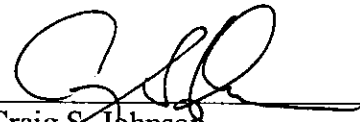
By 

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**ATTORNEYS FOR MID-MISSOURI  
TELEPHONE COMPANY**

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that a true and accurate copy of the foregoing was sent via U.S. Mail, postage prepaid, on this 10 day of September, 2002, to all counsel of record.

  
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Craig S. Johnson