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Vice Chair

**Missouri Public Service Commission**

POST OFFICE BOX 360  
JEFFERSON CITY, MISSOURI 65102  
573-751-3234  
573-751-1847 (Fax Number)  
<http://www.ecodev.state.mo.us/psc/>

March 10, 2000

BRIAN D. KINKADE  
Executive Director

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Director, Research and Public Affairs

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Director, Utility Operations

ROBERT SCHALLENBERG  
Director, Utility Services

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Director, Administration

DALE HARDY ROBERTS  
Secretary/Chief Regulatory Law Judge

DANA K. JOYCE  
General Counsel

**FILED**

MAR 10 2000

**Missouri Public  
Service Commission**

Mr. Dale Hardy Roberts  
Secretary/Chief Regulatory Law Judge  
Missouri Public Service Commission  
P. O. Box 360  
Jefferson City, MO 65102

**RE: Case No. TM-2000-532**

Dear Mr. Roberts:

Enclosed for filing in the above-captioned case are an original and fourteen (14) conformed copies of the **STAFF RECOMMENDATION**.

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,

*W K Haas*

William K. Haas  
Deputy General Counsel  
(573) 751-7510  
(573) 751-9285 (Fax)

WKH/lb  
Enclosure  
cc: Counsel of Record

BEFORE THE PUBLIC SERVICE COMMISSION  
OF THE STATE OF MISSOURI

FILED

MAR 10 2000

Missouri Public  
Service Commission

In the Matter of the Application of )  
WorkNet Communications, Inc. for )  
Approval of Pro Forma Internal Corporate )  
Reorganization. )

Case No. TM-2000-532

**STAFF RECOMMENDATION**

COMES NOW the Staff of the Missouri Public Service Commission (Staff) and for its recommendation states:

1. On March 1, 2000 WorkNet Communications, Inc. filed an Application for Approval of Pro Forma Internal Corporate Reorganization and requested expedited treatment of its Application.
2. The Application does not state a reason for the requested expedited treatment.
3. In the attached Memorandum which is labeled Appendix A, the Staff recommends that the Missouri Public Service Commission reject the Application as non-compliant with Commission Rules 4 CSR 240-2.060 (6) (G) and (H), or in the alternative, that the Commission issue a Notice of Deficiency.

Respectfully submitted,

DANA K. JOYCE  
General Counsel

Wm K Haas  
William K. Haas  
Deputy General Counsel  
Missouri Bar No. 28701

Attorney for the Staff of the  
Missouri Public Service Commission  
P. O. Box 360  
Jefferson City, MO 65102  
(573) 751-7510 (Telephone)  
(573) 751-9285 (Fax)

### **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 10th day of March 2000.

Wm K Haas

# MEMORANDUM

To: Missouri Public Service Commission Official Case File  
Case No. TM-2000-532

From: Tom Solt *TS* *BN*  
Telecommunications Department

*[Signature]* 3/8/00  
Project Coordinator/Date

*Wm K Nance* 3/10/00  
General Counsel's Office/Date

Subject: Staff Recommendation to Reject Application

Date: March 8, 2000

On March 1, 2000, WorkNet Communication, Inc. (WorkNet), an Missouri certificated interexchange telecommunications carrier (IXC), filed an Application for Approval of Pro Forma Internal Corporate Reorganization (Application) and requested expedited treatment of its Application. The Telecommunications Department Staff (Staff) has reviewed the application and is of the opinion that the application is not in compliance with 4 CSR 240-2.060 (6) (G), which in part requires "a statement of the impact, if any, the merger or consolidation will have on the tax revenues of the political subdivision in which any structures, facilities or equipment of the companies involved are located," and 4 CSR 240-2.060 (6) (H), which in part states:

Competitive telecommunications companies . . . must file a pleading indicating what company will be holding the certificate of service authority and providing service to Missouri customers, the tariff under which service will be provided, and whether the remaining company has either pending or final decisions or judgments against it from any state or federal agency involving service to customers or rates charged."

WorkNet counsel indicated that all of the information required by the 6 (H) above can be implied from the Application and indicated it would not amend its application. Therefore, Staff requests that the Commission reject WorkNet's Application as non-compliant with the Commission's rules, or in the alternative, that the Commission issue a Notice of Deficiency ordering correction of the deficiency.

RECEIVED  
MAR 09 2000  
MS 10:54  
COMMISSION COUNSEL  
PUBLIC SERVICE COMMISSION

**Service List for**  
**Case No. TM-2000-524**  
**March 10, 2000**

Office of the Public Counsel  
P.O. Box 7800  
Jefferson City, MO 65102

Mark Klamer  
Bryan Cave LLP  
211 North Broadway  
St. Louis, MO 63102-275

Douglas D. Orvis  
Swidler Berlin Shereff Friedman LLP  
3000 K Street, NW  
Suite 3000  
Washington, DC 20007-511