

**BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI**

FullTel, Inc.)	
)	
Complainant,)	
)	
v.)	Case No. TC-2006-0068
)	
CenturyTel of Missouri, LLC,)	
)	
Respondent.)	

**CENTURYTEL OF MISSOURI, LLC'S
INITIAL RESPONSE TO COMPLAINANT'S
PETITION FOR SECOND PREHEARING CONFERENCE**

COMES NOW CenturyTel of Missouri, LLC ("CenturyTel" or "Respondent"), pursuant to Commission Rule 4 CSR 240-2.080(15), and for its Initial Response to Complainant's "Petition for Second Prehearing Conference" ("Petition"), respectfully states as follows:

1. At the close of business on January 10, 2006, undersigned counsel received an electronic service copy of Complainant's Petition wherein Complainant requests that the Commission schedule a pretrial conference as soon as possible, not later than Thursday, January 12, 2006 (tomorrow), and that CenturyTel's opportunity "to respond to the motion should be truncated [which must assume minutes/hours rather than the normal 10-day period contemplated by 4 CSR 240-2.080(15)], lest the rules of the Commission be used to further delay the expedient disposition of this matter." (Petition, Par. 9, page 3). Although CenturyTel has fully cooperated in good faith with Complainant's

proposed procedural mechanisms in this proceeding¹, the Commission has determined that it is unable to resolve this matter on the pleadings and that a hearing would therefore be scheduled to resolve the issues presented. (Order Setting Evidentiary Hearing, December 27, 2005). Because Respondent was not willing to jointly seek what appeared to be an informal request for reconsideration of that Order, Complainant has filed a pleading laced with implications and innuendo suggesting bad faith motives of delay on the part of Respondent. Such suggestions are inflammatory and inaccurate; any delay in this matter has been of the Complainant's own making.

2. Counsel is not available for a second prehearing conference this week. Mr. Cal Simshaw of CenturyTel is out of the office until January 19, 2006 and, should the Commission decide that a second prehearing is appropriate, scheduling a second prehearing conference at a date/time mutually agreeable to the parties after that date will not prejudice Complainant.

¹ Which Complainant appears to begrudgingly acknowledge, see Par. 2 and 3, Page 2.

WHEREFORE, CenturyTel of Missouri, LLC files its initial response in opposition to the relief requested in Complainant's Petition for Second Prehearing Conference.

Respectfully submitted,

/s/ Larry W. Dority
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Attorneys for CenturyTel of Missouri, LLC

CERTIFICATE OF SERVICE

I hereby certify that the undersigned has caused a complete copy of the attached document to be electronically filed and served on the Commission's Office of General Counsel (at gencounsel@psc.mo.gov), the Office of Public Counsel (at opcservice@ded.mo.gov), and counsel for FullTel, Inc. (at comleym@ncrpc.com & Andrew.Klein@DLAPiper.com), on this 11th day of January, 2006.

/s/ Larry W. Dority