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March 3, 2004

VIA OVERNIGHT DELIVERY

Mr. Dale Roberts Chief A.L.J./Executive Secretary Missouri Public Service Commission 200 Madison Street, Suite 100 Jefferson City, MO 65102 (573) 751-3234

FILED⁴

MAR 0 4 2004

Missouri Public Service Commission

Re: Arizona Telephony Brokers, L.L.C. Case No. TC-2004-0319

Dear Mr. Roberts:

Enclosed please find for filing an original and eight (8) copies of Arizona Telephony Brokers, L.L.C.'s Response to Complaint.

I have also enclosed an extra copy of this letter to be date stamped and returned to me in the enclosed, self-addressed, postage prepaid envelope.

If you have any questions or if I may provide you with any additional information, please do not hesitate to contact me.

, , Respectfully submitted,

Lance J.M. Steinhart Attorney for Arizona Telephony Brokers, L.L.C.

Enclosures

cc: Robert S. Rife Office of Public Counsel Office of General Counsel

BEFORE THE PUBLIC SERVICE COMMISSION OF THE STATE OF MISSOURI

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The Staff of the Missouri Public Service Commission,
Complainant v.
Arizona Telephony Brokers, L.L.C.
Respondent.

MAR 0 4 2004 Missouri Public Service Commission

FILED

Case No. TC-2004-0319

RESPONSE TO COMPLAINT

Arizona Telephony Brokers, L.L.C. (hereinafter "Respondent"), by its attorneys,

hereby respectfully requests that the Missouri Public Service Commission (the "Commission")

dismisses the Complaint dated January 29, 2004 in the above-referenced Case. The

Respondent declines mediation.

Respondent was served with Notice of Complaint on February 4, 2004 stating that 2002

Annual Report and assessment was not filed on or before April 15, 2003.

The Complaint was served on Respondent by its registered agent on February 12,

2004.

Notice Regarding Mediation was served on Respondent by its registered agent on February 24, 2004.

Upon receipt of the Commission's Complaint, Arizona Telephony Brokers, LLC took immediate steps and responded to the Commission's request by submitting the Annual Report to the Missouri Public Service Commission. Respondent has been notified that the filing of the annual report does not dismiss litigation proceedings and that the Respondent may still be liable under Commission rules and regulations.

Arizona Telephony Brokers, L.L.C. submitted a completed 2002 Annual Report form to the Commission's Data Center. The document was stamped "Received, February 17, 2004, Records, Public Service Commission." Staff has reviewed that submission and has determined that it has been completed as required. The document has been placed in the Electronic Filing and Information System and assigned the tracking number BMAR-2004-0082.

Furthermore, subsequent to the initial deadline for filing the 2002 Annual Report, Respondent entered into a contract with Telecom Compliance Services, Inc., a nationally known regulatory compliance firm to assist Respondent to comply with the reporting requirements of the regulatory authorities throughout the United States, including the Missouri Secretary of State and the Missouri Public Service Commission.

Respondent earnestly apologizes to the Commission, and would like to assure the Commission that its future filings will be timely and accurate. Respondent has taken steps, and will take any further necessary steps, to insure that it remains in compliance with Commission rules and regulations.

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WHEREFORE, Arizona Telephony Brokers, L.L.C. respectfully requests to

maintain their certificate of service authority in the state of Missouri and that the Complaint be dismissed for the reasons set forth herein.

Respectfully submitted,

Arizona Telephony/Brokers, L.L.C.

By:

Lance J.M. Steinhart

Lance J.M. Steinhart, PC 1720 Windward Concourse Suite 250 Alpharetta, Georgia 30005 (770) 232-9200 (770) 232-9208 (Fax) Georgia Bar No. 678222

and

Judith A. Rau, Esq. Rau & Rau 119 E. Mill Street Waterloo, IL 62298 (618) 939-7186 Missouri Bar No. 24856

Attorneys for Respondent

Dated: Mr 32104

CERTIFICATE OF SERVICE

I hereby certify that I have this day served a true copy of the foregoing Application for Certificate of Service Authority to Provide Interexchange Telecommunications Services Within the State of Missouri on the following parties, in accordance with the Commission rules:

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

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

Dated this <u>M</u> day of <u>M</u> , 2004.

Lance J.M. Steinhart Georgia Bar No. 678222

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