

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

An Investigation of the Fiscal and Operational)
Reliability of Cass County Telephone Company)
and New Florence Telephone Company, and)
Related Matters of Illegal Activity.)

Case No. TO-2005-0237

**STAFF’S MARCH 2005 STATUS REPORT, DISCLOSURE
OF CONTACTS WITH COMMISSION, AND MOTION FOR LEAVE TO LATE FILE**

COMES NOW the Staff of the Missouri Public Service Commission (“Staff”) and for its March 2005 Status Report, Disclosure of Contacts with Commission and Motion for Leave to Late File states:

1. By Order effective January 28, 2005 the Commission established this case for the purpose of investigating the “financial and operational status of any certificated company in which Mr. Kenneth Matzdorff has any ownership interest or any operational control or influence resulting from his role as an officer or employee of such company.”
2. In its Order the Commission directed Staff to “file a status report on February 1, 2005, and every 30 days thereafter to inform the Commission of the status of its work”
3. Due to the press of other matters before the Commission the Staff was unable to prepare a March 2005 status report in advance of this pleading.
4. The Staff has met and developed the work scope and staff assignments for the investigation established in this case, including detailed work plans.

5. The Staff has consolidated and organized the multitude of documents that the Staff had accumulated before this case was opened, and has begun arranging onsite facilities for field audit work and inspections.

6. The Staff is maintaining contact with Staff of the Kansas Corporation Commission, Staff at the FCC and personnel at USAC and NECA regarding the Staff's investigation for purposes of coordination and cooperation. The Staff has issued numerous data requests since the Staff's last status report.

7. By Order effective February 10, 2005 the Commission clarified its Order that established this case and modified it to "apply the provisions of section 386.210.3 RSMo Supp 2004" and directed that "any communications that have occurred since this case was opened [January 14, 2005] shall be treated according to the provisions of that statute."

8. In addition to contacts already disclosed, the undersigned counsel for the Staff discloses that he had contacts with Chairman Davis and Secretary Dale Hardy Roberts regarding designation of a process server and to obtain signatures for Commissioner *subpoenas duces tecum* directed to Local Exchange Company, LLC. Those *subpoenas* were served on Local Exchange Company, LLC on March 7, 2005. Copies of the *subpoenas* and accompanying documents are attached hereto and filed herewith.

WHEREFORE, the Staff moves the Commission for leave to file late the Staff's foregoing March 2005 Status Report, and discloses the above contacts with the Commission.

Respectfully submitted,

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/s/ Nathan Williams

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Certificate of Service

I hereby certify that copies of the foregoing have been mailed, hand-delivered, transmitted by facsimile or emailed to all counsel of record this 8th day of March 2005.

/s/ Nathan Williams