



**Commissioners**

**JEFF DAVIS**  
Chairman

**CONNIE MURRAY**

**STEVE GAW**

**ROBERT M. CLAYTON III**

**LINWARD "LIN" APPLING**

***Missouri Public Service Commission***

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

**WESS A. HENDERSON**  
Director, Utility Operations

**ROBERT SCHALLENBERG**  
Director, Utility Services

**DALE HARDY ROBERTS**  
Secretary/Chief Regulatory Law Judge

**DANA K. JOYCE**  
General Counsel

March 7, 2005

Local Exchange Company, LLC  
Registered Agent Brydon, Swearngen & England  
312 E. Capitol Avenue  
Jefferson City MO 65102

**RE: Case No. TO-2005-0237 subpoena**

Dear Sirs:

In lieu of producing the items as requested in the enclosed *subpoena*, if practicable, sworn copies of the items may be filed in Commission Case No. TO-2005-0237 **before** the date they are to be produced in accordance with the *subpoena*.

Please contact Nathan Williams, Senior Counsel, or Dana K. Joyce, General Counsel, with any questions regarding the *subpoena*. They may be reached at 573-751-8702 and 573-751-2481, respectively.

Sincerely,

*Dana K. Joyce By SD*  
Dana K. Joyce, General Counsel  
Public Service Commission

Enclosure.

# SUBPOENA DUCES TECUM

## Order to Produce Documents



THE STATE OF MISSOURI.

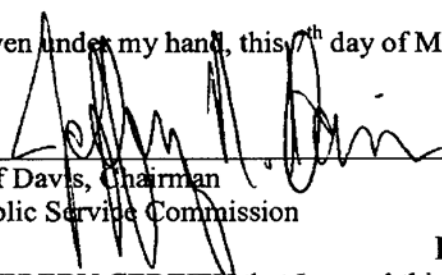
Case No. TO-2005-0237

To Local Exchange Company, LLC  
Registered Agent Brydon, Swearengen & England  
312 E. Capitol Avenue  
Jefferson City MO 65102

You are hereby commanded to appear before The Public Service Commission of the State of Missouri at 9:00 a.m. on the 6<sup>th</sup> day of April 2005, at the Commission's offices located on the 4<sup>th</sup> floor of the Governor Office Building, 200 Madison Street, Jefferson City, Missouri with the following:

The items listed on ATTACHMENT A.

Given under my hand, this 7<sup>th</sup> day of March 2005,

  
Jeff Davis, Chairman  
Public Service Commission

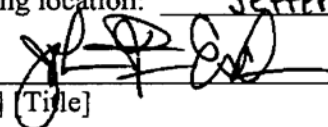
### RETURN

I HEREBY CERTIFY that I served this subpoena by:

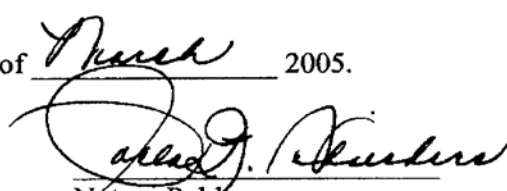
(☒) delivering a copy to the person named above.

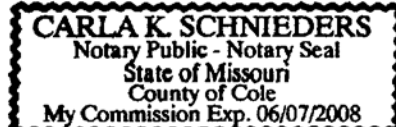
( ) reading a copy to the person named above.

at 3:10 pm (time) on the 7 day of March 2005, at the  
following location: Jefferson City, in the State of Missouri.

  
[Name] [Title]

Subscribed and sworn to before me this 7<sup>th</sup> day of March 2005.

  
Notary Public



## ATTACHMENT A

1. All written procedures and other documentation supporting the process used to bill Cass County Telephone Company, LP subscribers, including those pertaining to implementation of a rate change.
2. All documentation of the billing cycle for Cass County Telephone Company, LP, including flow charts and collection cycle flow charts with descriptions.
3. All documentation of the current bill print and mailing costs for billings of Cass County Telephone Company, LP subscribers.
4. Each document regarding a policy or procedure for credit or collection activities by Cass County Telephone Company, LP.
5. Each document reflecting the payment options of a subscriber to services of Cass County Telephone Company, LP, including fee charges and paid commissions for the period January 1, 2003 to present.
6. Each document showing a policy or procedure of Cass County Telephone Company, LP for disconnects/reconnects of delinquent subscriber accounts.
7. Each document showing, scheduled disconnect activity and completed disconnect activity from January 1, 2003 to the present.
8. Each document showing a policy or procedure for all Call Center activities for Cass County Telephone Company, LP.
9. Each document showing performance of the Call Center for Cass County Telephone Company, LP for the period January 1, 2003 to present.
10. Each bank deposit record generated by customer payments made from January 1, 2003 to present.



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General Counsel

March 7, 2005

Jeff Davis, Chairman  
Missouri Public Service Commission

**RE: 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.**

Dear Chairman Davis:

Section 386.440.1 RSMo 2000 provides that a subpoena issued by the Commission or any Commissioner may be served by "any person authorized to serve process of courts of record or by any person of full age designated for that purpose by the Commission or by a Commissioner." The Office of the General Counsel of the Missouri Public Service Commission requests that you designate John VanEschen, the Manager of the Telecommunications Department of the Missouri Public Service Commission and a person of full age, to serve subpoenas issued by the Commission or any Commissioner in the above case.

Sincerely,

Nathan Williams, Senior Counsel  
Public Service Commission

I hereby designate John VanEschen, Manager of the Telecommunications Department of the Missouri Public Service Commission as a person of full age authorized to serve subpoenas issued by the Commission or any Commissioner in the Commission's case styled, "**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.**"

Jeff Davis, Chairman  
Public Service Commission