

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

Staff of the Public Service Commission of)	
the State of Missouri,)	
)	
Complainant,)	
)	Case No. TC-2006-0184
v.)	
)	
New Florence Telephone Company,)	
)	
Respondent.)	

Staff Pleading Regarding Direct Testimony

COMES NOW the Staff of the Missouri Public Service Commission (Staff), and respectfully states:

1. The Staff's Direct Testimony in this case consists of the testimonies of Staff witnesses Janis Fischer and David Winter and the deposition testimonies of LEC, LLC employees and others.

2. The Staff and New Florence Telephone Company have agreed regarding the use in this case of depositions the Staff took in 2005 as part of an informal investigation involving Cass County Telephone Company and New Florence Telephone Company. Those parts of the depositions to which the Staff and New Florence Telephone Company have agreed may be used in this case are attached hereto and will be offered at hearing pursuant to Supreme Court Rule 57.07(a). These depositions are, for now, designated Highly Confidential in totality. Two of the deponents did not have errata sheets and two did. The errata sheets included in this filing are redacted consistent with the agreement on which parts of the depositions may be used as evidence in this case. The Staff will pursue with counsel for New Florence which portions of these depositions may be made public.

3. In addition, the Staff conducted depositions on February 8 and 9, 2006 in the present case. These depositions are also attached hereto as Highly Confidential in totality and will be offered at hearing pursuant to Supreme Court Rule 57.07(a). Again, the Staff will pursue with counsel for New Florence which portions of these depositions may be made public.

4. The Staff is taking an additional deposition on February 22, 2006 that will be filed in this case as soon as possible and will be offered at hearing pursuant to Supreme Court Rule 57.07(a).

WHEREFORE, the Staff respectfully submits this pleading and depositions attached thereto as part of its direct case.

Respectfully submitted,

/s/ Robert V. Franson

Robert V. Franson

Senior Counsel

Missouri Bar No. 34643

Attorney for the Staff of the
Missouri Public Service Commission
P. O. Box 360
Jefferson City, MO 65102
(573) 751-6651 (Telephone)
(573) 751-9285 (Fax)
email: robert.franson@psc.mo.gov

Certificate of Service

I hereby certify that copies of the foregoing have been mailed, hand-delivered, or transmitted by facsimile or electronically mailed to all counsel of record this 22nd day of February, 2006.

/s/ Robert V. Franson