

**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 Further Response to the Commission's April 1, 2005 Order**

COMES NOW the Staff of the Public Service Commission and for its further response to the Commission's April 1, 2005 Order states:

1. In its April 1, 2005 order entitled, "Order Extending Deadline for Compliance with Subpoenas and Directing Staff Filing" the Commission directed the Staff to, no later than April 8, 2005, file a pleading stating "what discovery disputes with LEC, LLC were resolved by the April 4, 2005 conference call, and setting forth its arguments concerning the disputes not resolved."

2. As the Staff related in its pleading filed April 8, 2005, the Staff's and LEC, LLC's attorneys have conferred regarding the information that the Staff is seeking to obtain through the *subpoenas* and LEC, LLC's concerns with the scopes of the *subpoenas*. As a result, the Staff and LEC, LLC have reached resolution, with the exception of items 3.b. and 3.b.i. of the *subpoena* identified by LEC, LLC as *subpoena 2* and for purposes of the *subpoenas* in question only, of the documents that LEC, LLC will provide to the Staff. The Staff does not know at this time that resolution of items 3.b. and 3.b.i. cannot be reached. The Staff stated its position on these items in its April 12, 2005 pleading titled, "STAFF'S SUGGESTIONS TO THE COMMISSION REGARDING LOCAL EXCHANGE COMPANY, LLC'S MOTION TO QUASH *SUBPOENAS*."

**WHEREFORE**, the Staff files this pleading in further response to the Commission's April 1, 2005 Order Extending Deadline for Compliance with Subpoenas and Directing Staff Filing.

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 electronically mailed to all counsel of record this 19<sup>th</sup> day of April 2005.

/s/ Nathan Williams  
Nathan Williams