

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

COMES NOW the Staff of the Public Service Commission and for its 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. The Staff and LEC, LLC's attorneys conferred telephonically for approximately two and one-half hours on April 4, 2005 regarding the information that the Staff is seeking to obtain through the *subpoenas* and LEC, LLC's concerns with the scopes of the *subpoenas*. LEC, LLC's attorney has advised the Staff's attorney that he has scheduled a meeting with his client on April 11, 2005 to further discuss the *subpoenas* and the April 4, 2005 telephone conference. LEC, LLC's attorney suggests that the April 8, 2005 date set by the Commission for reporting the status of discussions between the Staff and LEC, LLC regarding the issues raised by the *subpoenas* and motion to quash be extended to April 19, 2005.

3. The Staff does not disagree with the suggestion of LEC, LLC's attorney to extend the filing date from April 8, 2005 to April 19, 2005.

4. The Staff does not know at this time if any resolution cannot be reached as to what documents LEC, LLC will disclose to the Commission's Staff.

5. The Staff plans to provide to the Commission in a pleading, filed as soon as possible and by no later than 5:00 p.m. Tuesday, April 12, 2005, the information the Staff is seeking in the documents the Staff recommended that the Commission order LEC, LLC to produce and suggestions addressing LEC, LLC's motion to quash the *subpoenas*.

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

Respectfully submitted,

DANA K. JOYCE
General Counsel

/s/ Nathan Williams

Nathan Williams
Senior Counsel
Missouri Bar No. 35512
nathan.williams@psc.mo.gov

Attorney for the Staff of the
Missouri Public Service Commission
P. O. Box 360
Jefferson City, MO 65102
(573) 751-8702 (Telephone)
(573) 751-9285 (Fax)

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 8th day of April 2005.

/s/ Nathan Williams

Nathan Williams