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June 4, 2002

Mr. Dale Hardy Roberts  
Missouri Public Service Commission  
P.O. Box 360  
Jefferson City, MO 65102

Re: **TC-2002-1100**

Dear Mr. Roberts:

Enclosed for filing on behalf of Spectra Communications Group, LLC d/b/a CenturyTel ("Spectra"), please find an original and eight (8) copies of Suggestions in Opposition to Motion for Expedited Treatment.

Would you please see that this filing is brought to the attention of the appropriate Commission personnel.

I thank you in advance for your cooperation in this matter.

Sincerely yours,

BRYDON, SWEARENGEN & ENGLAND P.C.

By: 

Sondra B. Morgan

SBM/lar  
Enclosure

cc: General Counsel  
Michael F. Dandino  
Paul Martin  
Ken Matzdorff

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

<b>COMPUTECHNOLOGY, INC.</b>	)	
<b>v.</b>	)	
<b>SPECTRA COMMUNICATIONS GROUP, L.L.C.,</b>	)	Case No. <b>TC-2002-1100</b>
<b>CENTURYTEL, INC.</b>	)	
<b>And</b>	)	
<b>GTE MIDWEST, INC, d/b/a</b>	)	
<b>VERIZON MIDWEST.</b>	)	

**SUGGESTIONS IN OPPOSITION TO  
MOTION FOR EXPEDITED TREATMENT**

Comes now Spectra Communications Group, LLC d/b/a CenturyTel ("Spectra") and for its Suggestions in Opposition to Motion for Expedited Treatment states to the Missouri Public Service Commission ("Commission") as follows:

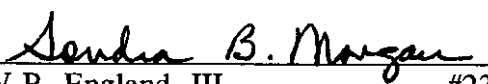
1. On May 31, 2002, Computech technology, Inc. ("Computech technology") filed its Complaint with the Commission against Spectra, as well as other parties, alleging that Spectra had engaged in unlawful and anticompetitive behavior. Also on May 31, Computech technology filed a Motion for Expedited Treatment in which it requested that the Commission "preserve the status quo by immediately entering an order directing the Companies to immediately reconnect, and further prohibiting the companies from disconnecting, service to Computech technology pending resolution of the aforesaid Complaint."

2. First, Spectra has no objections to an expedited procedural schedule in this proceeding, and is willing to file an Answer to the Complaint within fifteen (15) days (i.e. June

19, 2002). Although Spectra denies the allegations of unlawful and anticompetitive behavior specifically listed in paragraph 3 of the Motion for Expedited Treatment, Spectra does not object to mediation of the matters referenced in Computechology's Complaint before the Commission. Spectra does, however, object to Computechology's request that the Commission immediately order it to restore service to Computechology, before Spectra is granted an opportunity to explain why the service was disconnected. Briefly, the regulated services which were disconnected on May 29, 2002, were two T-1 lines. These lines were first placed in service on April 20, 2001, and they were billed to Computechology in accounts Nos.095-754-5090 and 095-754-5091. The monthly charge for each line is \$771.06 for a combined monthly total of \$1514.12 . Computechology has only made partial payments on these accounts since they were established, and the last payment was a partial payment in March of 2002. As of the date of the disconnect, Computechology owed \$9543.14 on these two accounts. Computechology has been repeatedly notified that failure to pay for these services would result in disconnection of services. There is no bona fide dispute in respect to the T-1 service being provided. Spectra simply could not continue to provide this service to this customer without being paid for its services that are over six (6) months in arrears. All of the other issues raised by Computechology in its Complaint and in this Motion are an attempt to confuse and obfuscate the simple fact that Computechology has not paid for the services rendered by Spectra. So, while Spectra is willing to discuss the issues raised in the Complaint and attempt to resolve the matters, it is simply not appropriate for the Commission to order Spectra to reconnect these lines without payment from Computechology for the services previously provided.

Wherefore Spectra respectfully requests that the Commission deny Computechology's Motion for Expedited Treatment and for any other relief appropriate in the circumstances.

Respectfully submitted,

  
W.R. England, III #23975  
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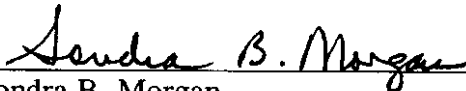
CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the above and foregoing document was sent by U.S. Mail, postage prepaid, or hand-delivered on this 4<sup>th</sup> day of June, 2002, to the following parties:

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