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December 22, 2003

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

**FILED**  
**DEC 22 2003**  
**Missouri Public**  
**Service Commission**

**Re: Case No. IO-2004-0231**

Dear Mr. Roberts:

Pursuant to Rule 4 CSR 240-2.080(20), attached please find an amended first page to Petitioners' Response to Order Directing Filing which we filed with the Commission on Friday, December 19, 2003. KLM Telephone Company was inadvertently omitted from the first paragraph in Petitioners' Response, and this amended first page is being filed to correct this oversight.

If you have any questions, please direct them to me at the above number. I thank you in advance for your cooperation in this matter.

Sincerely,

*Brian T. McCartney*

Brian T. McCartney

BTM/da

Enclosure

cc: Parties of Record

**FILED**

**DEC 22 2003**

**Missouri Public  
Service Commission**

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

Petition for Suspension of the Federal )  
Communications Commission Requirement )  
to Implement Number Portability )

Case No. IO-2004-0231

**Petitioners' Response to Order Directing Filing**

COME NOW Cass County Telephone Company (Cass County), Citizens Telephone Company of Higginsville, Missouri Inc. (Citizens), Green Hills Telephone Corporation (Green Hills), Lathrop Telephone Company (Lathrop), and KLM Telephone Company (KLM) (hereinafter "Petitioners") and for their Response to the Commission's *Order Directing Filings* state as follows:

**SUMMARY**

On November 10, 2003, the Federal Communications Commission (FCC) issued its order directing the implementation of wireline-to-wireles local number portability ("LNP") for carriers within the largest 100 Metropolitan Statistical Areas ("MSAs"). The FCC's order presents numerous financial, legal, and technical obstacles for the *petitioning small rural local exchange companies that are located partially or entirely* within an MSA. Therefore, Petitioners filed a request for suspension of the LNP requirements with the Commission pursuant to the Telecommunications Act of 1996 ("the Act"). See 47 U.S.C. §251(f). The Commission granted a temporary suspension on November 20, 2003.

On December 11, 2003, the Commission directed the Petitioners to provide *documentation supporting their request for suspension*. Accordingly, Petitioners have gathered company-specific information to document the financial and technical