ANDERECK, EVANS, MILNE, PEACE & BAUMHOER, L.L.C. ATTORNEYS AT LAW

305 EAST MCARTY STREET

EUGENE E. ANDERECK TERRY M. EVANS ERWIN L. MILNE JACK PEACE PATRICK A. BAUMHOER CRAIG S. JOHNSON RODRIC A. WIDGER GEORGE M. JOHNSON **BEVERLY J. FIGG** PEGGY D RICHARDSON CARL E LIPPELMAN WILLIAM S. LEWIS VICTOR 5. SCOTT LESLEY A. RENFRO DANA L. KOLLAR J. W. TRIMMER COREY K. HERRON JOSEPH B MYERS, JR. MARVIN L. SHARP OF COUNSEL GREGORY C. STOCKARD

(1004-1993)

PHIL HAUCK (1924-1991)

PO BOX 1438 JEFFERSON CITY, MISSOURI 65102-1438 TELEPHONE 873-634-3422 FAX 873-634-7822 September 10, 1997 TRENTON OFFICE 914 AND WASHINGTON STREET PO. 80X 547 TRENTON, MISSOURI 64683-0547 816-359-2244 FAX 816-359-2116

SPRINGFIELD OFFICE 1111 S. GLENSTONE P.O. BOX 4929 SPRINGFIELD, MISSOURI 65808-4929 417-864-6401 FAX 417-864-4907

> PRINCETON OFFICE 807 NORTH WASHINGTON PRINCETON, MISSOURI 64673 816-748-2244

> > SMITHVILLE OFFICE

110 F. MAIN STREET

P.O. BOX 654

SMITHVILLE, MISSOURI 64089

816-532-3895

FAX 816-532-3899

FILED

SEP 1 0 1997

MISSOURI

Mr. Cecil Wright Executive Secretary Missouri Public Service Commission P.O. Box 360 Jefferson City, MO 65102-0360

RE: Case TO-98-49

Dear Mr. Wright:

Please find enclosed an original and fourteen copies of The Mid-Missouri Group's Motion For Early Prehearing Conference. A copy of this letter and a copy of the Motion have been mailed to all attorneys of record.

Thank you for seeing this filed.

Sincerely, Johnson s.

CSJ/ksw enclosure

)

)

)

)

)

MATULAI

SEP 1 0 1997

BEFORE THE PUBLIC SERVICE COMMISSION OF THE STATE OF MISSOURI

In the Matter of the Application of the) Mid-Missouri Group and the Small Telephone Company Group of Incumbent Local Exchange Companies for Designation as Telecommunications Company Carriers Eligible for Federal Universal Service Support pursuant to § 254 of the 1996 Telecommunications Act.

MISSOURI PUBLIC SERVICE COMMISSION

) Case No. TO-98-49

MOTION FOR EARLY PREHEARING CONFERENCE

Comes Now The Mid-Missouri Group, applicants in this case, hereby moves the Commission for an Early Prehearing Conference in this docket.

In support hereof, The Mid-Missouri Group states as follows:

On or about August 1, the Small Company Local Exchange 1. Companies in the State of Missouri filed an Application For Designation as Eligible Carriers for Federal Universal Service Fund pursuant to §254 the Telecommunications Act of 1996.

2. Pursuant to the provision of the Federal Act, applicants requested the eligible carrier designation to be made prior to December 31, 1997.

On or about August 8, 1997, the Commission issued an 3. Order and Notice in this docket.

Subsequent to the Order and Notice, an Application to 4. Intervene was filed on behalf of United Telephone Company Missouri, d/b/a Sprint, an Application to Participate Without Intervention was filed by GTE of the Midwest, an Application to Intervene was filed on behalf of MCI Telecommunications Corporations and MCI Metro Access. An Application to Intervene was filed on behalf of

F:\WP61\DOC\T0148K.MOT

. Southwestern Bell Telephone Company. In addition the Mid-Missouri Group has filed a Response to the Application to Intervene of MCI and United. Those Applications and their Responses thereto presently pend without order.

5. The Application of the Small Telephone Companies was constructed in such a fashion as to obviate the necessity of a formal hearing. In view of the requested approval date of December 31, 1997, The Mid-Missouri Group is concerned that Contests regarding Intervention not unduly delay the procedural schedule in this case.

6. The Mid-Missouri Group respectfully suggests that an early Prehearing Conference will allow all parties to convene to determine if and what issues raised in the Application are in dispute, and suggest a procedural schedule consistent with the disputed issues as well as being designed to allow resolution of this case prior to the December 31, 1997 requested action date.

7. The undersigned counsel of record has spoken to all present attorneys of record, and no party opposes an early Prehearing Conference as requested herein.

Wherefore, The Mid-Missouri Group respectfully requests that the Commission issue an Order scheduling an early Prehearing Conference in this case, consistent with the foregoing, to give such other and further relief as the Commission deems appropriate.

F:\WP61\DOC\T0148K.MOT





4.4

ANDERECK, EVANS, MILNE, PEACE & BAUMHOER

By Craig S. Johnson MO Bar # 28179 305 East McCarty Street Hawthorn Building, 3rd Floor Post Office Box 1438 Jefferson City, Missouri 65102 Telephone: (573) 634-3422 Facsimile: (573) 634=7822

ATTORNEY FOR THE MID-MISSOURI GROUP

CERTIFICATE OF SERVICE

This is to certify that a true and correct copy of the foregoing Motion For Early Prehearin Conference was mailed via U.S. mail, postage prepaid, this $\cancel{10}$ the day of $\cancel{10}$ day of $\cancel{10}$, 1997, to:

Mr. Carl Lumley Lelane Curtis 130 S. Bemiston, Suite 200 Clayton, MO 63105

Stephen Morris 701 Brazos, Suite 600 Austin, TX 78701

General Counsel Missouri Public Service Commission P.O. Box 360 Jefferson City, MO 65102-0360

Office of Public Counsel P.O. Box 7800 Jefferson City, MO 65102-7800

W.R. England Sondra Morgan Attorneys at Law P.O. Box 456 Jefferson City, MO 65102-0456

Linda Gardner United Telephone Co. 5454 W. 110th Street Overland Park, KS 66211

ohnson