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December 23, 1998

Mr. Dale Hardy Roberts
Secretary/Chief Regulatory Law Judge
Missouri Public Service Commission
P.O. Box 360
Jefferson City, MO 65102

FILED

DEC 23 1998

Missouri Public
Service Commission

Re: Case No. TO-98-49

Dear Mr. Roberts:

Enclosed please find the original plus fourteen (14) copies of Request for Additional Time to Complete Network Upgrades in Regard to Designation as Eligible Carrier for Federal Universal Service Support for filing on behalf of Ozark Telephone Company in the above referenced matter. Please bring this matter to the attention of the appropriate Commission personnel. A copy of this filing is being sent to all parties of record.

Thank you for your attention to this matter.

Very truly yours,

BRYDON, SWEARENGEN & ENGLAND P.C.

By: *Sandra Morgan*

Sondra B. Morgan

SBM/k

Enclosures

cc: Office of Public Counsel
Penny Baker
Counsel of Record
Jay Mitchell

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BEFORE THE PUBLIC SERVICE COMMISSION
STATE OF MISSOURI

FILED

DEC 23 1998

Missouri Public
Service Commission

In the Matter of the Application of the)
Mid-Missouri Group and the Small)
Telephone Company Group of)
Incumbent Local Exchange Companies) Case No. TO-98-49
for Designation as Telecommunications)
Company Carriers Eligible for Federal)
Universal Service Support pursuant to)
§ 254 of the 1996 Telecommunications Act.)

REQUEST FOR ADDITIONAL TIME TO
COMPLETE NETWORK UPGRADES IN REGARD TO
DESIGNATION AS ELIGIBLE CARRIER FOR
FEDERAL UNIVERSAL SERVICE SUPPORT

Comes now Ozark Telephone Company ("Ozark") and states to the Missouri Public Service Commission ("Commission") as follows:

1. On August 1, 1997, the Mid-Missouri Group and the Small Telephone Company Group ("STCG") jointly filed an Application for Designation as Eligible Carriers Pursuant to Section 254 of the Telecommunications Act of 1996. In this Application the companies requested designation as telecommunications companies eligible to receive federal universal service support under 47 C.F.R. § 54.201(d).

2. In this Application the companies asserted that they provided all of the services necessary for receipt of support except that three companies requested additional time to provide single-party service and none of the companies were capable of providing toll limitation for qualifying low-income customers as that service was defined by the Federal Communications Commission ("FCC"). On December 4, 1997, the Commission issued its Order Approving Stipulation and Designation of Eligible Telecommunications Carriers in which it designated each of the carriers an eligible telecommunications carrier for purposes of receiving federal universal

service support and granted the request of the three companies for additional time up to December 31, 1998, to provide single-party service finding that exceptional circumstances prevented these companies from providing this service. Ozark was one of the three companies granted additional time to provide single-party service. On October 20, 1998, the Commission issued an Order Amending Order Designating Certain Eligible Telecommunications Carriers in which it granted the motion of the Mid-Missouri Group and the STCG for amendment of the Order to recognize that the companies now meet the FCC's requirement for toll limitation.

3. On September 8, 1998, Ozark filed a Second Motion for Extension of Time to Complete Modernization Plan in Case Nos. TM-95-134 and TO-93-309. Ozark stated to the Commission that because of difficulties in obtaining financing from the Rural Utilities Service and the Rural Telephone Bank it was unable to complete its upgrades by the end of 1998. On December 15, 1998, the Commission issued its Order Granting Second Extension of Time to Complete Modernization Plan and Setting Hearing Date in which it granted Ozark up to June 30, 1999, for completion of its Modernization Plan.

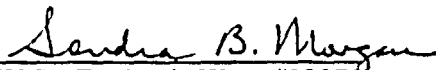
4. At the present time, Ozark still has 148 customers who have not been converted to single-party service. Ozark has now received authorization for the release of funds from RUS and is converting customers to single-party service daily, but it will not have all of these customers converted by December 31, 1998.

5. 47 CFR 54.101(c) states that a telecommunications carrier that is otherwise eligible to receive universal service support under § 54.201 may request additional time to complete the network upgrades necessary to provide single-party service. State commissions may grant such a request upon a finding that exceptional circumstances prevent an otherwise eligible

telecommunications carrier from providing these services. Since Ozark has demonstrated to the Commission in Case Nos. TM-95-134 and TO-93-309 that exceptional circumstances prevent the company from completing the conversions to single-party service by December 31, 1998, Ozark now requests that the Commission find that exceptional circumstances prevent the company from completing the upgrades in the context of its designation as an eligible telecommunications carrier for purposes of receiving federal universal service support as well and grant Ozark additional time up to June 30, 1999, to complete the conversion of its customers to single-party service.

Wherefore, Ozark Telephone Company respectfully requests that the Commission grant its Request for Additional Time to Complete Network Upgrades in Regard to Designation as Eligible Carrier for Federal Universal Service Support and for any other relief appropriate in the circumstances.

Respectfully submitted,


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CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the above and foregoing document was either hand-delivered or sent via facsimile, this 23rd day of December, 1998, to:

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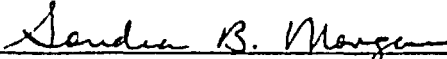
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