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October 25, 2002

Missouri Public Service Commission
Attn: Secretary of the Commission
200 Madison Street, Suite 100
P. O. Box 360
Jefferson City, MO 65102-0360

FILED³

OCT 25 2002

Missouri Public
Service Commission

RE: Case No. CO-2003-0094
**The Pager Company dba The Pager & Phone Company's Application for
Designation as an Eligible Telecommunications Carrier for Federal
Universal Service Support for Lifeline and LinkUp Programs**

Dear Secretary:

Enclosed please find an original and five copies of the **RESPONSE IN
OPPOSITION TO MOTION FOR HEARING** for filing with the Commission on behalf of
The Pager Company dba The Pager & Phone Company.

Thank you for assistance in the processing this filing. Copies are being served
on the Commission's General Counsel and Office of the Public Counsel. Please
contact me at 634-8109 if there are any questions.

Sincerely,



Mary Ann (Garr) Young

Enclosure

cc: General Counsel
Office of the Public Counsel
Mark Foster, Foster & Malish

BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI

FILED³

OCT 25 2002

In the matter of the Application of)
The Pager Company dba)
The Pager & Phone Company)
for Designation as a Telecommunications)
Carrier Eligible for Federal Universal)
Service Support pursuant to Section 254)
of the Telecommunications Act of 1996)

**Missouri Public
Service Commission**

Case No. CO-2003-0094

RESPONSE IN OPPOSITION TO MOTION FOR HEARING

Comes now The Pager Company dba The Pager & Phone Company ("PagerCo" or "Applicant"), by its undersigned counsel, and hereby files its Response in Opposition to Motion for Hearing. In support of its this Response, PagerCo states as follows:

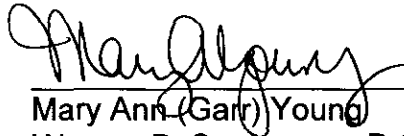
1. PagerCo submits that a hearing is not required in this matter. PagerCo is preparing an Amended Application at this time, which will be filed sometime prior to November 1, 2002. Based on review of prior eligible telephone carrier (ETC) cases before this Commission, PagerCo believes that the Amended Application will place before the Commission all that is required to grant the ETC designation.

2. Scheduling this matter for hearing would be an unnecessary expense of Commission and PagerCo resources, and unnecessarily delay resolution of PagerCo's request. It would also work a competitive disadvantage to PagerCo. No other CLECs have been required to present evidence at a hearing prior to obtaining ETC designation, nor were any of the incumbent local exchange carriers (ILEC).

WHEREFORE, Applicant The Pager Company dba The Pager & Phone Company respectfully requests that the Commission deny the Office of Public Counsel's Motion for Hearing. In the alternative, PagerCo requests the Commission hold its ruling on the Motion

for Hearing in abeyance until the parties have an opportunity to review PagerCo's First Amended Application.

Respectfully submitted,



Mary Ann (Garr) Young Mo. Bar #27951

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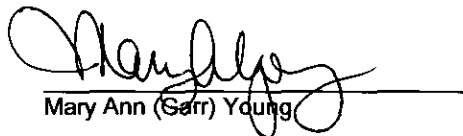
Fax: 573-634-8224

Email: myoung0654@aol.com

COUNSEL FOR THE PAGER COMPANY dba
THE PAGER & PHONE COMPANY

CERTIFICATE OF SERVICE

I hereby certify that a copy of this document has been hand delivered or mailed by first class mail, postage prepaid to the Office of Public Counsel and the General Counsel of the Missouri Public Service Commission on this 25th day of October 2002.



Mary Ann (Garr) Young