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November 22, 2002

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

**FILED**<sup>3</sup>

NOV 22 2002

**Re: Case No. CO-2003-0162**

**Missouri Public  
Service Commission**

Dear Mr. Roberts:


Enclosed for filing on behalf of Green Hills Area Cellular Telephone, Inc. d/b/a Green Hills Telecommunications Services, please find an original and eight (8) copies of a Motion for Extension of Time To Respond To Public Counsel's Motion for Evidentiary Hearing.

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: Michael Dandino  
William Haas  
Renee Reeter

BEFORE THE PUBLIC SERVICE COMMISSION  
STATE OF MISSOURI

**FILED<sup>3</sup>**  
NOV 22 2002

Missouri Public  
Service Commission

In the Matter of the Application of )  
Green Hills Area Cellular Telephone, Inc. )  
d/b/a Green Hills Telecommunications Services )  
for Designation as a Telecommunications )  
Company Carrier Eligible for Federal Universal )  
Service Support pursuant to § 254 of the )  
Telecommunications Act of 1996. )

Case No.CO-2003-0162

MOTION FOR EXTENSION OF TIME TO RESPOND TO  
PUBLIC COUNSEL'S MOTION FOR EVIDENTIARY HEARING

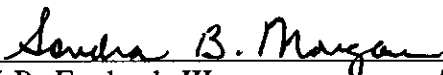
Comes now Green Hills Area Cellular Telephone, Inc. d/b/a Green Hills  
Telecommunications Services ("GHTS" or "Applicant"), and for its Motion for Extension of  
Time to Respond to Public Counsel's Motion for Evidentiary Hearing, states to the Missouri  
Public Service Commission ("Commission") as follows:

1. On October 3, 2002, GHTS filed an application requesting designation as an eligible telecommunications carrier for purposes of Federal Universal Service Support pursuant to Section 254 of the Telecommunications Act of 1996.
2. On November 14, 2002, the Commission issued Notice of the application and set an intervention deadline of December 4, 2002.
3. Also on November 14, 2002, the Office of Public Counsel filed a motion requesting an evidentiary hearing. Responses to this motion are due by November 25, 2002.
4. On November 20, 2002, the Staff of the Commission filed a Motion for Extension of Time to Respond to Public Counsel's Motion for Evidentiary Hearing in which it requested that it be given until December 10, 2002, to respond to Public Counsel's motion.

5. Counsel for GHTS has had conversations with counsel for Public Counsel and Staff and believes that it will be possible to resolve this case through stipulation. It will be necessary, however, to wait until after the intervention deadline of December 4 to know if there are any intervenors, and, if so, if they will be willing to enter into a stipulation. GHTS, therefore, also requests additional time to respond to the motion of the Public Counsel.

Wherefore, GHTS respectfully requests that the Commission grant its Motion for Extension of Time to Respond to Public Counsel's Motion for Evidentiary Hearing and extend the deadline for replying to at least December 10, 2002.

Respectfully submitted,

  
W.R. England, III #23975  
Sondra B. Morgan #35482  
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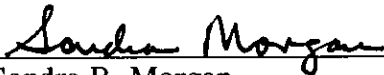
Attorneys for Green Hills Area Cellular  
Telephone, Inc. d/b/a Green Hills  
Telecommunications Services

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 22<sup>d</sup> day of November, 2002, to the following parties:

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

Michael F. Dandino  
Senior Public Counsel  
Office of Public Counsel  
P.O. Box 7800  
Jefferson City, MO 65102

  
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Sondra B. Morgan