

STATE OF ILLINOIS  
ILLINOIS COMMERCE COMMISSION

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Illinois Independent Telephone Association )  
)

CHIEF CLERK'S OFFICE

Petition for initiation of an investigation of the necessity of and the establishment of a Universal Service Support Fund in accordance with Section 13-301(d) of the Public Utilities Act )  
)

Docket No. 00-0233

Illinois Commerce Commission )  
On its Own Motion )  
)

Cons.

Investigation into the necessity of an, if appropriate, the establishment of an universal service support fund pursuant to Section 13-301(d) of the Public Utilities Act. )  
)

Docket No. 00-0335

REPLY TO JOINT RESPONSE REGARDING ORAL ARGUMENTS

NOW COME LEAF RIVER TELEPHONE COMPANY, ALHAMBRA-GRANTFORK TELEPHONE COMPANY, CROSSVILLE TELEPHONE COMPANY, GLASFORD TELEPHONE COMPANY, MONTROSE MUTUAL TELEPHONE COMPANY, NEW WINDSOR TELEPHONE COMPANY, ONEIDA TELEPHONE EXCHANGE, VIOLA HOME TELEPHONE COMPANY and WOODHULL COMMUNITY TELEPHONE COMPANY, by its attorney, GARY L. SMITH of the firm of LOEWENSTEIN, HAGEN & SMITH, P.C., and hereby reply to the Joint Response supporting the need for oral argument filed by Verizon North, Inc., Verizon South, Inc., and Illinois Bell Telephone Company:

1. On August 14, 2001, the Commission entered an Order granting oral argument filed on behalf of LEAF RIVER TELEPHONE

COMPANY, ALHAMBRA-GRANTFORK TELEPHONE COMPANY, CROSSVILLE TELEPHONE COMPANY, GLASFORD TELEPHONE COMPANY, MONTROSE MUTUAL TELEPHONE COMPANY, NEW WINDSOR TELEPHONE COMPANY, ONEIDA TELEPHONE EXCHANGE, VIOLA HOME TELEPHONE COMPANY and WOODHULL COMMUNITY TELEPHONE COMPANY on its initial brief.

2. The Motion was granted after the Hearing Examiner's proposed Order was issued.

3. After reviewing the Hearing Examiner's proposed Order, LEAF RIVER TELEPHONE COMPANY, ALHAMBRA-GRANTFORK TELEPHONE COMPANY, CROSSVILLE TELEPHONE COMPANY, GLASFORD TELEPHONE COMPANY, MONTROSE MUTUAL TELEPHONE COMPANY, NEW WINDSOR TELEPHONE COMPANY, ONEIDA TELEPHONE EXCHANGE, VIOLA HOME TELEPHONE COMPANY and WOODHULL COMMUNITY TELEPHONE COMPANY see no need for oral argument in this proceeding and did not file exceptions to the Hearing Examiner's proposed Order. Therefore, the parties hereto believe that oral argument need not be held in this proceeding, especially given the voluminous number of issues and parties involved.

4. It is anomalous and ironic for a party to withdraw its own motion and non-moving parties to object.

5. No other party has requested oral argument, although the Commission is empowered to hold oral argument on its own motion if it sees fit.

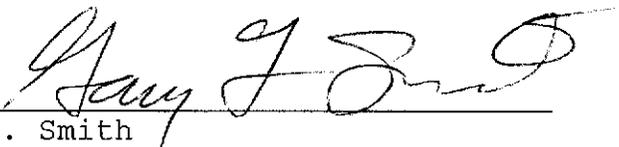
6. In the event that the Commission proceeds with oral argument, oral argument should be held on August 28, 2001, effectively last Springfield meeting date before the September 30, 2001, deadline for the expiration of the DEM fund. Joint movants have suggested a September 5, 2001, oral argument date in Chicago, but this is a Springfield case and the prior proceedings have been held in Springfield. Furthermore, nearly all the rural carriers involved in this case are much closer to Springfield than Chicago and many companies can be expected to view the proceedings if any are held.

WHEREFORE, Intervenors herein request that the Commission dispense with oral argument, but if oral argument is to be held, that it be held on August 28, 2001, in Springfield, Illinois, and for such other relief as deemed just.

Respectfully submitted,

LEAF RIVER TELEPHONE COMPANY,  
ALHAMBRA-GRANTFORK TELEPHONE  
COMPANY, CROSSVILLE TELEPHONE  
COMPANY, GLASFORD TELEPHONE  
COMPANY, MONTROSE MUTUAL TELEPHONE  
COMPANY, NEW WINDSOR TELEPHONE  
COMPANY, ONEIDA TELEPHONE  
EXCHANGE, VIOLA HOME TELEPHONE  
COMPANY and WOODHULL COMMUNITY  
TELEPHONE COMPANY

BY: LOEWENSTEIN, HAGEN & SMITH,  
P.C.

By:   
Gary L. Smith  
LOEWENSTEIN, HAGEN & SMITH, P.C.  
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(217) 525-1199

PROOF OF SERVICE

The undersigned certifies that a copy of the foregoing instrument was served upon all parties to the above cause by enclosing the same in an envelope addressed to such party at their address as follows:

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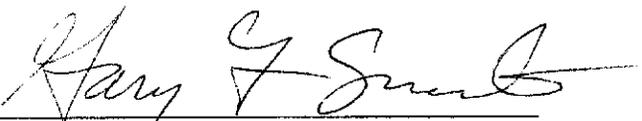
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with postage fully prepaid, and by depositing said envelope in a  
U.S. Post Office Mail Box in Springfield, Illinois on this \_\_\_\_\_  
day of August, 2001.

  
\_\_\_\_\_  
Gary L. Smith

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