

BEFORE THE MISSOURI PUBLIC SERVICE COMMISSION  
OF THE STATE OF MISSOURI

FILED

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Missouri Public  
Service Commission

In the matter of AT&T Communications )  
of the Southwest, Inc., Tariff Filing )  
Proposing Direct Inward Dial for Digital )  
Link Service. )

Case No. TT-99-137

MOTION TO SUSPEND TARIFF FILING

COMES NOW the Staff of the Missouri Public Service Commission (Staff) and for its motion states:

1. On October 30, 1998, AT&T Communications of the Southwest, Inc. (AT&T) filed, with the Missouri Public Service Commission (Commission), tariff sheets proposing to introduce Direct Inward Dial (DID) and Main Listed Number services for AT&T Digital Link service. The tariff sheets bore an effective date of November 30, 1998, which AT&T extended to December 7, 1998.

2. The Commission's Records Department has assigned Tariff File No. 9900352 to this filing. The tariff pages included in this filing are Section 2: 1<sup>st</sup> Revised Index Sheet 1, Original Sheet 13.1, Original Sheet 13.2, 1<sup>st</sup> Revised Sheet 22; Section 3: 2<sup>nd</sup> Revised Sheet 1; Section 9: 2<sup>nd</sup> Revised Index Sheet 1, 1<sup>st</sup> Revised Sheet 1, 1<sup>st</sup> Revised Sheet 2, 2<sup>nd</sup> Revised Sheet 3, 1<sup>st</sup> Revised Sheet 3.1, 1<sup>st</sup> Revised Sheet 4, Original Sheet 4.1, 1<sup>st</sup> Revised Sheet 5, 1<sup>st</sup> Revised Sheet 6, Original Sheet 12, Original Sheet 13, Original Sheet 14, Original Sheet 15, Original

Exhibit No. 10  
Case No(s) 10-7003-0012  
Date 2/7/03 Rptr Silch 9900352

Sheet 16, Original Sheet 17, Original Sheet 18, Original Sheet 19; and Price Schedule: 1"  
Revised Sheet 1, 1" Revised Sheet 2, 1" Revised Sheet 3, Original Sheet 4, Original Sheet 5.

3. Currently, Digital Link service is a facilities based, local exchange service for business customers which permits outward local calling capabilities from a customer's premises utilizing Direct Outward Dialing (DOD) over dedicated digital facilities or an external Local Exchange Company (LEC) provided Centrex service.

4. When AT&T first proposed Digital Link service in Case No. TA-96-332, the Staff recommended approval because "AT&T is not proposing to offer basic local service at this time. For a service to be defined as 'basic' local telecommunications service, it must be, at a minimum, two-way service. By its description, Digital Link service is a one-way, outbound service. As a one-way service, it cannot be a 'basic' local telecommunications service." The Staff recommendation also stated, "Since there is no obligation to provide access to local emergency services for a local telecommunications service that is considered a non-basic local telecommunications service, it is irrelevant that AT&T's tariff filing does not mention that it will provide access to local emergency services."


5. The current proposal, among other things, is to add Direct Inward Dialing (DID) capabilities to the Digital Link service. The Staff believes that if approved, AT&T's Digital Link Service would authorize AT&T to provide two way switched voice service within a local calling scope. The Staff is not opposed to AT&T offering two way switched voice service within a local calling area. However, the Staff is concerned that AT&T's proposal would not allow its end users the ability to obtain emergency telephone service (E-911), where available. The Staff is further concerned that AT&T's proposal would not conform to these and other standards previously established by the Commission for other LECs who offer two way switched

voice service within a local calling scope. For example, AT&T's proposal does not list the exchanges of the incumbent in which AT&T seeks to provide Digital Link service nor does AT&T's proposed tariff sheets acknowledge the exchange boundaries of any incumbent LEC. Plainly stated, the Staff is concerned that AT&T's proposal might not conform to the Commission's Report and Order approving the Stipulation and Agreement and granting a certificate to AT&T in Case No. TA-96-322.

WHEREFORE, the Staff recommends the Commission suspend AT&T's tariff filing proposing Direct Inward Dial for Digital Link service (Tariff File No. 9900352) for further consideration and analysis.

Respectfully submitted,

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