

BEFORE THE PUBLIC SERVICE COMMISSION

STATE OF MISSOURI

Northeast Missouri Rural Telephone Company)	
)	
Complainant,)	
)	
v.)	Case No. IC-2008-0285
)	
AT&T Corp.)	
)	
Respondent.)	

Northeast Missouri Rural Telephone Company
Reply to AT&T Corp.'s Response to Motion for Summary Disposition

Comes now Complainant Northeast Missouri Rural Telephone Company, in reply to AT&T Corp.'s Response to Motion for Summary Judgment, and states as follows:

1. In its Response, AT&T acknowledges that it owes Northeast the difference between Northeast's intrastate and interstate exchange access rates for intrastate calls made through AT&T's enhanced prepaid calling cards service that originated or terminated in Northeast's exchanges.
2. In its Response, AT&T indicates its understanding that the only issues for Commission determination in this case are (1) whether AT&T and Northeast reached a previous settlement on the claims underlying this Complaint; and (2) a quantification of what AT&T Corp. owes Northeast.
3. AT&T does not dispute any statement of material undisputed fact set forth in Northeast's Motion for Summary Disposition.

4. Northeast's Motion for Summary Disposition should be granted, as the pleadings establish that there is no issue of disputed fact pertaining to AT&T's liability.

Wherefore, on the basis of the foregoing, Northeast respectfully requests that the Commission enter an Order Disposing of the issue of AT&T's responsibility or liability to Northeast for the difference between Northeast's intrastate and interstate exchange access rates for intrastate calls made through AT&T's enhanced prepaid calling cards service that originated or terminated in Northeast's exchanges, and limiting the issues for hearing to:

- a. AT&T's affirmative defense of accord and satisfaction;
- b. the quantification of the difference between Northeast's intrastate and interstate exchange access rates for intrastate calls made through AT&T's enhanced prepaid calling cards service that originated or terminated in Northeast's exchanges;
- c. the issue of whether AT&T is responsible for late fees on such traffic, and the quantification thereof.

_____/s/
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CERTIFICATE OF SERVICE

A copy of this document was served on the following parties by e-mail on this
2nd day of June, 2008:

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