

**BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI**

Mid-Missouri Telephone Company,)	
)	
Petitioner,)	
)	
vs.)	Case No. TC-2002-190
)	
Southwestern Bell Telephone Company,)	
)	
Respondent.)	

**SOUTHWESTERN BELL TELEPHONE COMPANY'S
RESPONSE TO MID-MISSOURI'S FIRST AMENDED COMPLAINT**

Southwestern Bell Telephone Company¹ respectfully submits this Response to Mid-Missouri Telephone Company's First Amended Complaint filed September 10, 2002:

1. On October 16, 2001, Mid-Missouri filed its initial Complaint in this proceeding, and the Missouri Public Service Commission issued the Notice of the Complaint on October 19, 2001.
2. Following Mid-Missouri's denial of Southwestern Bell's request to voluntarily mediate this dispute, Southwestern Bell on December 19, 2001, filed its Answer, Affirmative Defenses and Response to Motions to Show Cause, For an Investigation, Injunction and Mandamus.
3. On September 10, 2002, Mid-Missouri filed its First Amended Complaint.
4. Upon review of the Mid-Missouri's First Amended Complaint, it appears that the amendment simply added an additional request for relief (added as a new subparagraph g at the end of the Complaint). From a substantive perspective, Southwestern Bell believes that the Answer it previously filed adequately responds to nearly all the allegations contained in Mid-Missouri's First Amended Complaint. Southwestern Bell therefore incorporates its prior Answer, its Affirmative

¹ Southwestern Bell Telephone Company, L.P., d/b/a Southwestern Bell Telephone Company, will be referred to in this pleading as "Southwestern Bell" or "SWBT."

Defenses, its Motion to Dismiss, and its Responses to Mid-Missouri's Motions, previously filed on December 19, 2001 into this Response by this reference.

5. In addition, Southwestern Bell specifically denies the allegations and requests for relief contained in the newly added paragraph (g) to Mid-Missouri's Complaint.

6. To the extent that Southwestern Bell has neither specifically admitted nor denied any allegation contained in Mid-Missouri's First Amended Complaint filed September 10, 2002, Southwestern Bell specifically denies it.

WHEREFORE, having fully answered, Southwestern Bell requests the Commission to enter an Order dismissing Complainants' First Amended Complaint.

Respectfully submitted,

SOUTHWESTERN BELL TELEPHONE, L.P.

BY



PAUL G. LANE	#27011
LEO J. BUB	#34326
ANTHONY K. CONROY	#35199
MIMI B. MACDONALD	#37606

Attorneys for Southwestern Bell Telephone, L.P.
One SBC Center, Room 3518
St. Louis, Missouri 63101
314-235-2508 (Telephone)
314-247-0014 (Facsimile)
leo.bub@sbc.com

CERTIFICATE OF SERVICE

Copies of this document were served on the following parties by e-mail on October 11, 2002.



Leo J. Bub

DAN JOYCE
MISSOURI PUBLIC SERVICE COMMISSION
PO BOX 360
JEFFERSON CITY, MO 65102

CRAIG S. JOHNSON
LISA CHASE
ANDERECK, EVANS, MILNE, PEACE &
JOHNSON LLC
PO BOX 1439
JEFFERSON CITY, MO 65102

MICHAEL F. DANDINO
JOHN B. COFFMAN
OFFICE OF THE PUBLIC COUNSEL
PO BOX 7800
JEFFERSON CITY, MO 65102

JAMES M. FISCHER
LARRY W. DORITY
FISCHER & DORITY P.C.
101 MADISON, SUITE 400
JEFFERSON CITY, MO 65101