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October 15, 1999

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Mr. Dale Hardy Roberts Secretary/Chief Regulatory Law Judge Missouri Public Service Commission P. O. Box 360 Jefferson City, MO 65102

RE: Case No. TO-99-593

Dear Mr. Roberts:

Enclosed for filing in the above-captioned case are an original and fourteen (14) conformed copies of a JOINT RESPONSE TO ORDER DIRECTING THE PARTIES TO FILE A PROPOSED PROCEDURAL SCHEDULE.

This filing has been mailed or hand-delivered this date to all counsel of record.

Thank you for your attention to this matter.

Sincerely yours

Deputy General Counsel

(573) 751-4140

(573) 751-9285 (Fax)

KRK:sw Enclosure

cc: Counsel of Record





In the Matter of the Investigation into)	
Signaling Protocols, Call Records,	ý	
Trunking Arrangements, and Traffic	Ś	Case No. Case No. TO-99-593
Measurement.	ĺ	

JOINT RESPONSE TO ORDER DIRECTING THE PARTIES TO FILE A PROPOSED PROCEDURAL SCHEDULE

COMES NOW the Staff of the Missouri Public Service Commission ("Staff"), on its own behalf and on behalf of all other parties to this case, and submits the following joint response to the Commission's order to file a proposed procedural schedule:

- 1. The Commission created this case by order dated June 15, 1999. The Commission subsequently granted intervention in this case to Southwestern Bell Telephone Company, the Mid-Missouri Group, Sprint Missouri, Inc., Sprint Communications Company, L.P., the Small Telephone Company Group, Fidelity Telephone Company, GTE Midwest Incorporated, AT&T Communications of the Southwest, Inc., TCG St. Louis, Inc., and TCG Kansas City, Inc. A Motion to Intervene Out of Time filed by Birch Telecom of Missouri, Inc. is pending.
- 2. On August 12, 1999, the Commission ordered the parties to attend a prehearing conference on September 21, 1999. The Commission also ordered the parties to file a proposed procedural schedule, including dates for the filing of testimony and for a hearing, by no later than October 21, 1999.

- 3. At the prehearing conference on September 21, 1999, the regulatory law judge stated that it would be helpful if the parties could agree upon the issues early on in the case. However, he did not order the parties to file a list of issues, and he approved of a suggestion by the parties that they seek to resolve the issues in the case through negotiation in workshops or technical conferences.
- 4. The parties have unanimously agreed that workshops among the technical employees of the parties would be helpful in identifying the issues in dispute, and have agreed to conduct two technical workshops. The first workshop will be held on January 19, 2000. This date was chosen in order to allow the parties to collect and evaluate the data concerning the first three months of their operations following the termination of the PTC Plan, which will occur on October 20, 1999. The second workshop will be held on February 22, 2000. The parties conducted a conference telephone call on October 7, 1999, and will conduct another conference telephone call on January 5, 2000, to establish the agenda for the first of these two workshops.
- 5. The parties unanimously agreed that a list of contested issues should not be prepared, and testimony should not be filed, until sometime in the second quarter of 2000, so that the parties will have time to evaluate the effects of the termination of the PTC Plan and to utilize the technical workshops in framing the issues, if any, that will be presented to the Commission for its determination. The parties therefore request that the time for filing a procedural schedule be postponed until no earlier than 30 days after February 22, 2000.

WHEREFORE, the parties request that the Commission modify its order to postpone the time for filing a procedural schedule until no earlier than 30 days after February 22, 2000.

Respectfully submitted,

DANA K. JOYCE General Counsel

Keith R. Krueger Deputy General Counsel

Missouri Bar No. 23857

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Certificate of Service

I hereby certify that copies of the foregoing have been mailed or hand-delivered to all counsel of record as shown on the attached service list this 15th day of October, 1999.

Service List for Case No. TO-99-593 October 15, 1999

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