Missouri Public Service Commission

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December 29, 2000

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DANA K. JOYCE
General Counsel

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

FILED²

DEC 2 9 2000

Missouri Public
Service Commission

RE: Case No. TO-98-115

Dear Mr. Roberts:

Enclosed for filing in the above-captioned case are an original and eight (8) conformed copies of the **LIST OF ISSUES.**

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,

Marc D. Poston
Senior Counsel
(573) 751-8701
(573) 751-9285 (Fax)

MP/lb
Enclosure
cc: Counsel of Record

Informed Consumers, Quality Utility Services, and a Dedicated Organization for Missourians in the 21st Century

FILED [2]

DEC 2 9 2000

Missouri Public
Service Commission

In the Matter of AT&T Communications)
of the Southwest, Inc.'s Petition for)
Second Compulsory Arbitration Pursuant)
to Section 252(b) of the)
Telecommunications Act of 1996 to) Case No. TO-98-115
Establish an Interconnection Agreement)
with Southwestern Bell Telephone)
Company.)

LIST OF ISSUES

COMES NOW the Staff of the Missouri Public Service Commission ("Staff") and for its List of Issues states as follows:

1. On December 12, 2000, the Commission issued its *Order Directing Filing* and ordered the parties to jointly submit a list of issues no later than December 29, 2000.

2. The parties compiled a List of Issues that is attached and labeled "Appendix A."

3. The attached List of Issues presents each issue in question format, followed by a listing of specific rate elements. Although specific rate elements are listed, the parties do not agree on the appropriateness of the listed rate elements and/or whether the rate elements are compensable. The listing of rate elements is only designed to aid the Commission in understanding the issues but is not intended to suggest whether a rate element is required or not.

WHEREFORE, the Staff respectfully submits this list of issues on behalf of all parties.

Respectfully submitted,

DANA K. JOYCE
General Counsel

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Senior Counsel
Missouri Bar No. 45722

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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 29th day of December 2000.

Issue 1.b. Does the Commission's October 2, 1997 Order, preclude SWBT from assessing multiplexing charges, in addition to the dedicated transport charges approved by the Commission and if not, what is the appropriate rate, if any? *							
Multiplexing							
VG to DS1							
DS1 to DS3							

Issue 1.c. Does the Commission's October 2, 1997 Order preclude SWBT from accessing Digital Cross Connect Systems (DCS) charges, when AT&T controls the DCS, and if not, what are the appropriate rates, if any? *							
Digital Cross-Connect System							
DS0 DCS Port							
DS1 DCS Port							
DS3 DCS Port							
DCS Establishment							
Database Modification							
Reconfiguration Charge							

Issue 1.d. Does the Commission's October 2, 1997 Order preclude SWBT from assessing charges for the LIDB Service Management System and the Fraud Monitoring System and a Service Order Charges (when AT&T has a new switch or orders a new type of access to LIDB for query origination) when these are used for AT&T, in addition to LIDB and CNAM query/query transport charges approved by the Commission, and if not, what is the appropriate rate, if any? *							
Line Information Database - Validation and CNAM							
Validation Query							
CNAM Service Query							
Query Transport							
Service Order Charge per request							

Issue 1.e. Does the Commission's October 2, 1997 Order preclude SWBT from assessing non-recurring charges, in addition to the CLEC Simple Conversion Charge approved by the Commission, when AT&T converts SWBT customers to AT&T service, using all network elements required to provide the service and if not, what are appropriate rates, if any? *							
Blocking/Screening							
Local Switching Port Charge per Month							
I/O Port							

* Although specific rate elements are listed, the parties do not agree on the appropriateness of
the listed rate elements and/or whether the rate elements are compensable nor should the listing
suggest whether a rate element is required or not.

Appendix A

1

Subloop Cross Connect						
2 Wire						
4 Wire						
Dedicated Transport						
DS1 Entrance Facilities						
DS3 Entrance Facilities						
OC3 Entrance Facilities						
OC12 Entrance Facilities						
Interoffice Transport						
OC3 Dedicated Transport I/O First Mile						
OC3 Dedicated Transport I/O Add. Mile						
OC12 Dedicated Transport I/O First Mile						
OC12 Dedicated Transport I/O Add. Mile						
OC48 Dedicated Transport I/O First Mile						
OC48 Dedicated Transport I/O Add. Mile						
Dedicated Transport Cross Connect						
DS1						
DS3						
OC12						
OC48						
Digital Cross-Connect System						
DS0 DCS Port						
DS1 DCS Port						
DS3 DCS Port						
DCS Establishment						
Database Modification						
Reconfiguration Charge						
Multiplexing						
VG to DS1						
DS1 to DS3						

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the listed rate elements and/or whether the rate elements are compensable nor should the listing
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SS7 Links - Cross Connect							
STP to Collo Cage - DS0 (Zones 1,2,3&4)							
STP to Collo Cage - DS1(Zones 1,2,3 & 4)							
Access to Directory Assistance Database, Attachment 6.9, 8.1							
Database Service							
Direct Access, per Search							
Service Establishment							
Call Branding (DA/OS)							
Rate per Initial Load							
Rate per subsequent changes to brand							
Service Rate Information (DA/OS)							
Rate per Initial Load							
Rate per subsequent rate change							
Rate per subsequent reference change							
Dark Fiber							
Cross Connect							
AIN							
DID Trunk Port							
DID #s - Initial 100 #s							
DID #s - Initial 10 #s							
Subsequent Add or Remove 100 #s							
Subsequent Add or Remove 10 #s							
Unbundled Centrex Systems Options							
System Establishment per serving office - Analog Only							
System Establishment per serving office - Analog/ISDN BRI Mix							
System Establishment per serving office - ISDN BRI Only							

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System Subsequent Change per serving office - Analog Only							
System Subsequent Change per serving office - Analog/ISDN BRI Mix							
System Subsequent Change per serving office - ISDN BRI Only							
System Subsequent Conversion per serving office - Add Analog to existing ISDN BRI only system							
System Subsequent Conversion per serving office - Add ISDN to existing Analog only system							
Dark Fiber Record Search Rate							
Subloop Feeder							
Interoffice							

Issue 1.f. Does the Commission's October 2, 1997 Order preclude SWBT from assessing service order charges, in addition to the $5.00 service order charges established by the Commission, in connection with AT&T orders for unbundled network elements and if not, what are the appropriate rates, if any? *

Service Order Charges - Unbundled Elements							
New Simple							
New Complex							
Change Simple							
Change Complex							
Record Simple							
Record Complex							
Disconnect Simple							
Disconnect Complex							
Suspend/Restore Simple							
Suspend/Restore Complex							
Expedited Simple							
Expedited Complex							
Customer Not Ready Simple							
Customer Not Ready Complex							

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Due Date Change or Cancellation Simple							
Due Date Change or Cancellation Complex							

Issue 1.h. May SWBT assess rating charges, in addition to the Operator Services and Directory Assistance charges established by the Commission, when SWBT provides rate quotation service to AT&T, either in a UNE or resale environment and if so, what are the appropriate rates, if any? *

Appendix DA-Resale							
Rate per initial load							
Rate per subsequent rate change							
Rate per subsequent reference change							
Appendix OS-Resale							
Rate per initial load							
Rate per subsequent rate change							
Rate per subsequent reference change							
Appendix DA-Fac.							
Rate per initial load							
Rate per subsequent rate change							
Rate per subsequent reference change							
Appendix OS-FAC.							
Rate per initial load							
Rate per subsequent rate change							
Rate per subsequent reference change							

Issue 1.j. Since the Commission's July 31, 1997 Order expressly addressed a rate for DS3 Dedicated Transport Cross-Connects, may SWBT assess dedicated transport cross-connect charges, other than the transport cross-connect charges established by the Commission and if so, what rates and charges should apply, if any? *

Dedicated Transport Cross Connect							
DS1							
OC3							
OC12							
OC48							

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the listed rate elements and/or whether the rate elements are compensable nor should the listing
suggest whether a rate element is required or not.

Issue 3.a.	What should be the rates White Pages-Resale and White Pages - Other? *					
	What should be the rates for Directory Listings? *					
	Single Side Informational Page (White Pages - Resale and White Pages - Other)					
	Appendix White Pages - Other					
	Price Per Book Copy Delivered in Bulk to LSP	NRC				
	Price Per Book Copy Delivered to LSP End-User	NRC				
	Price per Book Copy Ordered After Initial Order	NRC				
	Appendix Directory Listings Information					
	Per Listing	NRC				
Issue 4.	Is NXX migration a form of interim number portability and if not what is the appropriate rate, if any? *					
	NXX Migration (per NXX)	NRC				
Issue 7	What additional elements need to be priced? *					
	Issue 7a.. Optical Transport (including multiplexing) *					
	Issue 7.b 4-wire PRI loop to multiplexer cross-connect *					
	Issue 7.c dedicated transport entrance facility when this element is actually utilized? *					
	DS1	Zone 1	Zone 2	Zone 3	Zone 4	NRC- Initial	NRC - Add'l
	DS3	Zone 1	Zone 2	Zone 3	Zone 4	NRC- Initial	NRC - Add'l
	OC3	Zone 1	Zone 2	Zone 3	Zone 4	NRC- Initial	NRC - Add'l
	OC12	Zone 1	Zone 2	Zone 3	Zone 4	NRC- Initial	NRC - Add'l
	Issue 7.d. SS7 links-cross connects *					
	STP to Collocation Cage - DS0	Zone 1	Zone 2	Zone 3	Zone 4	NRC- Initial	NRC - Add'l
	STP to Collocation Cage - DS1	Zone 1	Zone 2	Zone 3	Zone 4	NRC- Initial	NRC - Add'l
	Issue 7.e. call branding for DA and OS *					
	Rate per branded call	NRC				
	Rate per initial load	NRC				
	Rate per subsequent charge to brand	NRC				

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the listed rate elements and/or whether the rate elements are compensable nor should the listing
suggest whether a rate element is required or not.

Issue 8. Does the Commission's October 2, 1997 Order address the pricing for the following items and if no what should the prices be? *							
Issue 8a. Loop Cross Connect without testing to DCS *							
Issue 8b. Loop Cross Connect with testing to DCS *							
Issue 8.c. Subloop Cross Connect *							
2 Wire	NRC- Initial	NRC - Add'l					
4 Wire	NRC- Initial	NRC - Add'l					
Issue 8.d. NRC for Unbundled Switch Port - Vertical Features *							
Feature Activation per Analog Port Type							
Call Waiting	NRC- Initial						
Call Forwarding Variable	NRC- Initial						
Call Forwarding Busy Line	NRC- Initial						
Call Forwarding Don't Answer	NRC- Initial						
Three-Way Calling	NRC- Initial						
Speed Calling 8	NRC- Initial						
Speed Calling 30	NRC- Initial						
Auto Callback/Auto Redial	NRC- Initial						
Distinctive Ring/Priority Call	NRC- Initial						
Selective Call Rejection/Call Blocker	NRC- Initial						
Auto Recall/Call Return	NRC- Initial						
Selective Call Forwarding	NRC- Initial						
Calling # Delivery	NRC- Initial						
CNAM Delivery	NRC- Initial						
Calling Number/Name Blocking	NRC- Initial						
Anonymous Call Rejection	NRC- Initial						
Feature Activation per analog arrangement							
Personalized Ring	NRC- Initial						
Hunting Arrangement	NRC- Initial						

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suggest whether a rate element is required or not.

Feature Activation per successful occurrence						
Call Trace (per feature per port)	NRC- Initial					
Call Trace (per successful occurrence per port)	NRC- Initial					
ISDN BRI Port Features						
CSV/CSD per B channel	NRC- Initial					
(required/provided)						
Basic EKTS per B channel	NRC- Initial					
Basic EKTS provides:						
Bridging Call Exclusion						
Bridging						
Call Forwarding Don't Answer						
Call Forwarding Interface Busy						
Call Forwarding Variable						
Message Waiting Indicator						
Speed Call (Long)						
Speed Call (Short)						
Three-way Conference Call						
CACH EKTS per B channel	NRC- Initial					
CACH EKTS includes:						
Additional Call Offering (inherent)						
Bridging Call Exclusion						
Bridging						
Call Forwarding Don't Answer						
Call Forwarding Interface Busy						
Call Forwarding Variable						
Intercom						
Key System Coverage for Analog Lines						
Message Waiting Indicator						
Speed Call (Long)						
Speed Call (Short)						
Three-way Conference Call						

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Basic Individual Features:							
Additional Call Offering	NRC- Initial						
Call Forwarding Don't Answer	NRC- Initial						
Call Forwarding Interface Busy	NRC- Initial						
Call Forwarding Variable	NRC- Initial						
Calling Number Deliver	NRC- Initial						
Hunt Group for CSD	NRC- Initial						
Hunt Group for CSV	NRC- Initial						
Message Waiting Indicator	NRC- Initial						
Secondary Only Telephone Number	NRC- Initial						
Three Way Conference Calling	NRC- Initial						
ISDN PRI Port Features							
CSV/CSD per B channel							
Backup D Channel	NRC- Initial						
CNAM Delivery	NRC- Initial						
Dynamic Channel Allocation	NRC- Initial						
DID #s - see Analog DID Trunk Port Features							
Analog DID Trunk Port							
DID #s - Initial 100 #s	NRC- Initial						
DID #s - Initial 10 #s	NRC- Initial						
Subsequent Add or Remove 100#s	NRC- Initial						
Subsequent Add or Removes 10#	NRC- Initial						
DS1 Digital Trunk Port DID							
DID #s - Initial 100 #s	NRC- Initial						
DID #s - Initial 10 #s	NRC- Initial						
Subsequent Add or Remove 100#s	NRC- Initial						
Subsequent Add or Removes 10#	NRC- Initial						
Analog Port Features for Unbundled Centrex							
Standard feature initialization per analog port	NRC- Initial						
Individual features (per feature per port)	NRC- Initial						
Automatic Callback	NRC- Initial						

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suggest whether a rate element is required or not.

Auto Callback Calling/Business Group Callback	NRC- Initial						
Call Forwarding Variable/ Business Group Call Forwarding Variable	NRC- Initial						
Call Forwarding Busy Line	NRC- Initial						
Call Forwarding Don't Answer	NRC- Initial						
Call Hold	NRC- Initial						
Call Pickup	NRC- Initial						
Call Transfer - All Calls	NRC- Initial						
Call Waiting - Intragroup/Business Call Forwarding Var.	NRC- Initial						
Call Waiting - Orig.	NRC- Initial						
Call Waiting - Term.	NRC- Initial						
Class of Service Restr. - Fully	NRC- Initial						
Class of Service Restr. - Semi	NRC- Initial						
Class of Service Restr. - Toll	NRC- Initial						
Consult. Hold	NRC- Initial						
Dial Call Waiting	NRC- Initial						
Directed Call Pickup - Non Barge in	NRC- Initial						
Directed Call Pickup - With Barge in	NRC- Initial						
Distinctive Ring and Call Waiting Tone	NRC- Initial						
Hunting Arrgmt - Basic	NRC- Initial						
Hunting Arrgmt - Circular	NRC- Initial						
Speed Calling Personal	NRC- Initial						
Three Way Calling	NRC- Initial						
Voice/Data Protection	NRC- Initial						
ISDN BRI Port Features for Unbundled Centrex							
CSV per B channel	NRC- Initial						
CSD per B channel	NRC- Initial						
Standard feature initialization per ISDN BRI port	NRC- Initial						
Individual Features per feature per B channel	NRC- Initial						
Add'l Call Offering for CSV	NRC- Initial						
Auto Callback Calling	NRC- Initial						
Call Forwarding Busy Line	NRC- Initial						

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Call Forwarding Don't Answer	NRC- Initial					
Call Forwarding Variable	NRC- Initial					
Call Hold	NRC- Initial					
Call Pickup	NRC- Initial					
Call Transfer - All Calls	NRC- Initial					
Class of Service Restr. - Fully	NRC- Initial					
Class of Service Restr. - Semi	NRC- Initial					
Class of Service Restr. - Toll	NRC- Initial					
Consult. Hold	NRC- Initial					
Dial Call Waiting	NRC- Initial					
Directed Call Pickup - Non Barge in	NRC- Initial					
Directed Call Pickup - With Barge in	NRC- Initial					
Distinctive Ringing	NRC- Initial					
Hunting Arrgmt - Basic	NRC- Initial					
Hunting Arrgmt - Circular	NRC- Initial					
Speed Calling Personal	NRC- Initial					
Three Way Calling	NRC- Initial					
e. Access to DA database *						
f. Dark fiber cross connect *	Recurring	NRC- Initial	NRC - Add'l			
g. Dark fiber record search rate *						
Subloop Feeder		NRC- Initial	NRC - Add'l			
Interoffice		NRC- Initial	NRC - Add'l			

* Although specific rate elements are listed, the parties do not agree on the appropriateness of
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suggest whether a rate element is required or not.

Service List for
Case No. TO-98-115
Revised: December 29, 2000 (lb)

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