

Paul G. Lane
General Counsel-
Missouri

Southwestern Bell Telephone
One Bell Center, Room 3520
St. Louis, Missouri 63101
Phone 314 235-4300
Fax 314 247-0014



January 5, 2000

FILED

JAN 5 2000

The Honorable Dale Hardy Roberts
Secretary/Chief Regulatory Law Judge
Missouri Public Service Commission
301 West High Street, Floor 5A
Jefferson City, Missouri 65101

Missouri Public
Service Commission

Re: Case No. TO-2000-322

Dear Judge Roberts:

Enclosed, for filing in the above-captioned case, are an original and fourteen copies of DIECA Communications, Inc d/b/a Covad Communications Company's and Southwestern Bell Telephone Company's Joint Issue Statement..

Thank you for bringing this matter to the attention of the Commission.

Very truly yours,

Paul G. Lane / tm

Paul G. Lane

Enclosures

cc: Attorneys of Record

FILED

JAN 5 2000

Missouri Public
Service Commission

BEFORE THE MISSOURI PUBLIC SERVICE COMMISSION

In the Matter of the Petition)
of DIECA Communications, Inc. d/b/a)
Covad Communications Company for)
Arbitration of Interconnection Rates, Terms,)
Conditions and Related Arrangements)
With Southwestern Bell Telephone Company)

Case No. TO-2000-322

JOINT ISSUE STATEMENT

DIECA Communications, Inc. d/b/a Covad Communications Company ("Covad") and Southwestern Bell Telephone Company ("SWBT") hereby jointly file the following issue statement in connection with the above-referenced arbitration.

Settled Issues

The parties have agreed upon Interconnection Agreement language for Issue A(1) (SWBT's xDSL Capable Loop Offering), Issue A(2) (Spectrum Management), the interval aspect of Issue A(3) (Loop Qualification Intervals), Issue A(4) (Maintenance), Issue A(5) (Provisioning Intervals) and Acceptance Testing.

Issues Remaining For Arbitration

While the number of issues have decreased since the filing of the petition, the parties agree that the following five (5) issues will be arbitrated, four of which relate to price.

ISSUE A(3) – LOOP QUALIFICATION

Should SWBT be allowed to charge for loop qualification and, if so, what is the appropriate price?

ISSUE A(6) – CONDITIONING CHARGES

Should SWBT be permitted to charge for xDSL loop conditioning and, if so, what is the appropriate price?

ISSUE A(7) – xDSL LOOP CHARGES

What are the appropriate recurring and non-recurring charges for ISDN loops ?

ISSUE A(8) – CROSS CONNECT CHARGES

What are the appropriate recurring and non-recurring charges for shielded and non-shielded cross connects?

ISSUE B – Unilateral, Substantive Modifications to SWBT's Technical Publications

Should SWBT have the ability to make unilateral substantive modifications to its technical publications?

Various issues may arise during the course of testimony and hearing regarding the appropriate methodology used to reach proposed rates. Covad reserves the right to add or

consider additional issue based upon testimony submitted in this arbitration SWBT reserves the right to oppose any new issues submitted by Covad.

Respectfully submitted,

Lisa C. Creighton /tm
Mark P. Johnson MO #30740
Lisa C. Creighton MO #42194
Sonnenschein, Nath & Rosenthal
4520 Main Street, Suite 1100
Kansas City, Missouri 64111
816/932-4400
816/531-7545 FAX

ATTORNEYS FOR DIECA COMMUNICATIONS, INC.
D/B/A COVAD COMMUNICATIONS COMPANY

AND

Paul G. Lane /tm
Paul G. Lane #27011
Mimi MacDonald #37606
Southwestern Bell Telephone Company
One Bell Center, Room 3516
St. Louis, Missouri 63101
314/235-4300
314/247-0014
ATTORNEYS FOR SOUTHWESTERN BELL
TELEPHONE COMPANY

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the above and foregoing was mailed, postage prepaid, this 5th day of January, 2000, to:

Office of the Public Counsel
P. O. Box 7800
Jefferson City, Missouri 65102

William K. Haas
Office of General Counsel
P. O. Box 360
Jefferson City, Missouri 65102

Paul G. Lane /tm
Paul G. Lane