

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

In the matter of the tariff filing of)	
AT&T Long Distance increasing)	Case No. _____
MRC on consumer calling plans)	Tariff No. JX-2008-0673

**OFFICE OF THE PUBLIC COUNSEL'S OBJECTION TO INCREASED
CHARGE**

The Office of the Public Counsel objects to the tariff that establishes the proposed increase in MRC for certain consumer calling plans and suggests that it is contrary to public policy and should not be implemented. Once again, while the industry contends that long distance is a highly competitive telecommunications product and the Missouri market is highly competitive, the dominant long distance company in Missouri proposes to increase rates. This increase once again demonstrates that the competition in Missouri's telecommunications market, even for long distance service, is not robust and offers little to no protection for consumers from the continued advance of prices. Apparently, competition cannot restrain this price increase in the Minimum Recurring Charges. Is there e some benefit to the consumer to offset to some extent the additional price burden? Has this proposed increase has been accompanied by any demonstration of improved service or advanced service for this long distance product?

Public Counsel is aware that the Public Service Commission is presently limited and will be even more limited in the future from any oversight of rates, terms, or conditions for competitive services or any telecommunications service offered by AT&T and its affiliate companies.

However, Public Counsel believes that the pricing terms, and conditions and other practices of competitive telecommunications companies should be made public to

keep the customers and the public at large advised and aware of price increases, reductions in services, complaints of inadequate service, billing and collection problems. The flow of this information to the public is vital since information on the terms and conditions of service provides consumers with information upon which consumers can make informed choices for service; in the “competitive” marketplace; the general availability of this type of information is key to the effective operation of competition. In addition, the PSC, its Staff, Office of Public Counsel and the public should be regularly provided with true, accurate and current information about the market and customer relations behavior and practices so they can remain aware of the status and condition of the telecommunications industry in Missouri and whether or not jurisdictional limitations on the PSC enacted in HB 1779 in the recently completed General Assembly session provide adequate consumer protection.

With these purposes and goals in mind, Public Counsel asks the Commission to take notice of this increase and Public Counsel’s objection that this increase in MRC for competitive services is inconsistent with robust competition, Section 392.185 (6), RSMo 2000 (“Allow full and fair competition to function as a substitute for regulation when consistent with the protection of ratepayers and otherwise consistent with the public interest”) and decline to approve the tariff.

Respectfully submitted,

OFFICE OF THE PUBLIC COUNSEL

/:/ Michael F. Dandino

BY: _____
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CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing was mailed or hand delivered this 28th day of May, 2008 to the following:

General Counsel
Missouri Public Service Commission.
P. O. Box 360
Jefferson City, MO 65102
GenCounsel@psc.mo.gov

Joann Rice
AT&T Long Distance
5130 Hacienda Drive, 3rd Floor, South
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/:/ Michael F. Dandino



SBC Long Distance, LLC
d/b/a AT&T Long Distance
5130 Hacienda Drive, 3rd Floor, South.
Dublin, CA 94568

RE JX-2008-0673

May 12, 2008

Ms. Colleen M. Dale
Secretary/Chief Regulatory Law Judge
Missouri Public Service Commission
200 Madison Street, Suite 100
Jefferson City, Missouri 65102

Re: Advice Letter #358 of SBC Long Distance, LLC d/b/a AT&T Long Distance
Amended

Dear Ms. Dale:

Enclosed you will find substitute Sheet 666 to the revisions to PSC Mo. - No. 3 of SBC Long Distance, LLC d/b/a AT&T Long Distance, previously filed. The purpose of this filing is to increase the MRC on certain consumer calling plans. Customer notices are attached. The tariff Sheets have an issue date of May 12, 2008 and a requested effective date of June 12, 2008.

If there are any questions regarding this filing, please contact me, Joann Rice, SBC Long Distance, LLC, 5130 Hacienda Drive, 3rd Floor, South, Dublin, CA 94568. I may be reached via telephone at (925) 803-6214 or via email at jr2136@att.com.

Thank you for your assistance in this matter.

Sincerely,

Joann Rice
Area Manager, Regulatory

Enclosures

cc: Office of the Public Counsel w/attachment

SECTION 4 - RATES AND CHARGES

4.4 Outbound Services-Switched Access (continued)

4.4.3 Consumer Outbound Services

(AE) Nationwide Calling Services, aka JustCallSM (continued)

.5 Rate Options (continued)

.o JustCallSM 5 Cents¹

The usage rate is \$0.05 per minute. The intrastate/interstate
MRC is \$6.00.

I

.p JustCallSM 7 Cents¹

The usage rate is \$0.07 per minute. The intrastate/interstate
MRC is \$5.00.

¹ This Service is no longer available to new Customers or existing Customers at new locations effective October 12, 2005.