

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

In the Matter of the Application of Comcast IP)
Phone of Missouri, LLC for Certificate of Service)
Authority to Provide Local Exchange and)
Interexchange Telecommunications Services)
Throughout the State of Missouri and to Classify)
the Company as Competitive)

Case No. LO-2008-0217

STAFF RESPONSE TO ORDER DIRECTING FILING

COMES NOW the Staff of the Missouri Public Service Commission, by counsel, and for its response states:

1. The Commission directed the parties to file, by no later than June 30, 2008, pleadings discussing the probable effect of HB 1779 on this case.

2. The General Assembly recently passed HB 1779, which is now awaiting Governor Blunt's signature. This bill, if signed into law, would amend Section 386.020 RSMo by defining "interconnected voice over Internet protocol service" and by explicitly stating that such service does not constitute "telecommunications service." This bill would also create a new Section 392.550 requiring a provider of interconnected voice over Internet protocol service to register with the Commission.

3. Registration to provide interconnected voice over Internet protocol under Section 392.550 is a separate procedure from certification to provide telecommunications services under sections 392.410 through 392.455. Registration under Section 392.550 imposes different, but sometimes similar, duties as certification.

4. Based on the record before the Commission, Comcast's Digital Voice service is "interconnected voice over Internet protocol service." Comcast's Digital Voice service is a

“telecommunications service” under the current definition but would be exempted from that definition if HB 1779 becomes law.

5. If the Governor signs HB 1779, the relevant sections will take effect on August 28, 2008.

6. If the Governor signs HB 1779, Comcast will continue to need certificate of service authority to provide telecommunications service through August 28, and will need to register as a provider of interconnected voice over Internet protocol service going forward.

7. If the Governor vetoes HB 1779, Comcast will continue to need certificate of service authority to provide telecommunications service.

Respectfully submitted,

/s/ William K. Haas

William K. Haas

Deputy General Counsel

Missouri Bar No. 28701

Attorney for the Staff of the
Missouri Public Service Commission
P. O. Box 360
Jefferson City, MO 65102
(573) 751-7510 (Telephone)
(573) 751-9285 (Fax)
william.haas@psc.mo.gov

Certificate of Service

I hereby certify that copies of the foregoing have been mailed, hand-delivered, transmitted by facsimile or electronically mailed to all counsel of record this 30th day of June 2008.

/s/ William K. Haas