BEFORE THE PUBLIC SERVICE COMMISSION OF THE STATE OF MISSOURI

)

)

)

In the Matter of an Investigation Into Various Issues Related to the Missouri Universal Service Fund.

Case No. TO-98-329

SBC MISSOURI'S RESPONSE TO STAFF'S OFFERED SCHEDULES AND PROCEDURES FOR IMPLEMENTING THE LOW-INCOME AND DISABLED PORTION OF THE FUND AS PROVIDED TO THE STAFF BY THE FUND ADMINISTRATOR

COMES NOW Southwestern Bell Telephone, L.P., d/b/a SBC Missouri ("SBC Missouri"), and for its response to the Missouri Public Service Commission Staff's offered Schedule And Procedures For Implementing The Low-Income And Disabled Portion Of The Fund As Provided To The Staff By The Fund Administrator" ("Offered Schedules and Procedures"), states as follows:

1. SBC Missouri agrees that the Administrator's proposed schedules and procedures satisfactorily address the timing and administration of customer discounts and carrier reimbursements, and that they are otherwise appropriate and should be implemented. More particularly, SBC Missouri supports implementing the activities on the "Proposed Key Dates" reflected in Staff's Offered Schedules and Procedures, Appendix A, pp. 6-7. We greatly appreciate the efforts undertaken by the Staff and the Administrator to meet the concerns shared by SBC Missouri and The Small Telephone Company Group, concerns which the Administrator acknowledged were valid. (Id., Appendix A, p. 1).

2. SBC Missouri would only further request that the Commission's order specifically reflect that by the last business day of every month, the Administrator should process and issue support payments to those carriers who submitted applications for reimbursement by

the 15th of that month. While the Administrator makes that recommendation for July, the first implementation month regarding carrier reimbursements (<u>id</u>., Appendix A, p. 7), the recommendation should be applied to every calendar month thereafter so that all participants in the process understand that the same operative due dates will apply on a rolling basis.¹

Respectfully submitted,

SOUTHWESTERN BELL TELEPHONE, L.P.

BY Robert J. Fryzonela

 PAUL G. LANE
 #27011

 LEO J. BUB
 #34326

 ROBERT J. GRYZMALA
 #32454

 MIMI B. MACDONALD
 #37606

Attorneys for Southwestern Bell Telephone, L.P. One SBC Center, Room 3516 St. Louis, Missouri 63101 314-235-6060 (Telephone) 314-247-0014 (Facsimile) robert.gryzmala@sbc.com

Certificate of Service

I hereby certify that copies of the foregoing have been electronically mailed to all counsel of record this 16th day of March, 2005.

Robert J. Suggmala

PETER MIRAKIAN SPENCER, FANE, BRITT & BROWNE, LLP 1000 WALNUT STREET, SUITE 1400 KANSAS CITY, MO 64106-2140

JAMES M. FISCHER FISCHER & DORITY, P.C. 101 MADISON, SUITE 400 JEFFERSON CITY, MO 65101

¹ In similar fashion, Staff's Motion For Commission Order Regarding assessments and Surcharges (at p. 3) requested that the Commission's order direct that carriers pay their assessments on the 22^{nd} of every month.

MARK W. COMLEY NEWMAN, COMLEY & RUTH P.C. 601 MONROE, SUITE 301 P.O. BOX 537 JEFFERSON CITY, MO 65102

REBECCA B. DECOOK AT&T COMMUNICATIONS OF THE SOUTHWEST, INC. 1875 LAWRENCE ST., RM. 1575 DENVER, CO 80202

WILLIAM R. ENGLAND, III BRIAN T. MCCARTNEY BRYDON, SWEARENGEN & ENGLAND PO BOX 456 JEFFERSON CITY, MO 65102

CRAIG S. JOHNSON ANDERECK, EVANS, MILNE, PEACE & BAUMHOER 700 EAST CAPITOL JEFFERSON CITY, MO 65102

KENNETH SCHIFMAN SPRINT MISSOURI, INC. 6450 SPRINT PARKWAY, BLDG. 14 MAIL STOP: KSOPHN0212-2A253 PAUL GARDNER GOLLER, GARDNER & FEATHER 131 E. HIGH STREET JEFFERSON CITY, MO 65101

STEPHEN F. MORRIS MCI WORLDCOM 701 BRAZOS, SUITE 600 AUSTIN, TX 78701 CARL J. LUMLEY LELAND B. CURTIS CURTIS, OETTING, HEINZ, GARRETT & SOULE, P.C. 130 S. BEMISTON, SUITE 200 ST. LOUIS, MO 63105

MARK P. JOHNSON SONNESCHEIN NATH ROSENTHAL 4520 MAIN STREET, SUITE 1100 KANSAS CITY, MO 64111

TERRY M. JARRETT OFFICE OF SECRETARY OF STATE 600 W. MAIN P. O. BOX 1767 JEFFERSON CITY, MO 65102

PUBLIC COUNSEL MICHAEL DANDINO OFFICE OF THE PUBLIC COUNSEL P.O. BOX 7800 JEFFERSON CITY, MO 65102 GENERAL COUNSEL MARC POSTEN MISSOURI PUBLIC SERVICE COMMISSION P.O. BOX 360 JEFFERSON CITY, MO 65102

RONALD MOLTENI ATTORNEY GENERAL STATE OF MISSOURI PO BOX 899 JEFFERSON CITY, MO 65102