

**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)	Case No. LO-2008-0217
Throughout the State of Missouri and to Classify)	
the Company as Competitive)	

STAFF’S MOTION FOR MORE DEFINITE STATEMENT

COMES NOW the Staff of the Missouri Public Service Commission and for its motion states:

1. The Staff seeks a more definite statement from Comcast IP Phone as to type of service it intends to provide and the type of certificate of service authority it is requesting.
2. The Commission’s Report and Order, as amended, in Case No. TC-2007-0111 found that Comcast IP Phone is offering and providing local exchange and interexchange telecommunications service without a certificate of convenience and necessity in violation of Section 392.410.2 RSMo (Supp. 2006). The Report and Order directed Comcast IP Phone to cease providing Comcast Voice Service or to apply for an appropriate certificate of service authority to provide that service by December 31, 2007.
3. On December 31, 2007, Comcast IP Phone filed the Application that is the subject of this case. The Applicant requests the Commission grant it a certificate of service authority to provide local exchange and interexchange telecommunications services.
4. The final sentence of Paragraph 5 of the Application states, “At the present time, [Applicant] does not intend to offer basic local telecommunications services.”
5. Paragraph 8 of the Application states, however:

8. [Applicant] intends to provide two-way voice service within a local calling scope comprised of the following services: (a) multiparty, single line, including installation, touchtone dialing, and any applicable mileage or zone charges; (b) access to local emergency services including, but not limited to, 911 service established by local authorities; (c) access to basic local operator services; (d) access to basic local directory assistance; (e) standard intercept service; and (f) one standard white pages directory listing. *See* Ch. 386.020(4)(a), (c), (f), (h), RSMo.³

³ Applicant does not intend to provide assistance programs for installation of, or access to, basic local telecommunications services for qualifying economically disadvantaged or disabled customers or both, including, but not limited to, lifeline services and link-up Missouri services for low-income customers or dual-party relay service for the hearing impaired and speech impaired. Ch. 386.020(4)(b). Applicant also does not intend to provide equal access to interexchange carriers. Ch. 386.020(4)(g).

6. Section 386.020(4) reads:

(4) **"Basic local telecommunications service"** [means] two-way switched voice service within a local calling scope as determined by the commission comprised of any of the following services and their recurring and nonrecurring charges:

(a) Multiparty, single line, including installation, touchtone dialing, and any applicable mileage or zone charges;

(b) Assistance programs for installation of, or access to, basic local telecommunications services for qualifying economically disadvantaged or disabled customers or both, including, but not limited to, lifeline services and link-up Missouri services for low-income customers or dual-party relay service for the hearing impaired and speech impaired;

(c) Access to local emergency services including, but not limited to, 911 service established by local authorities;

(d) Access to basic local operator services;

(e) Access to basic local directory assistance;

(f) Standard intercept service;

(g) Equal access to interexchange carriers consistent with rules and regulations of the Federal Communications Commission;

(h) One standard white pages directory listing.

Basic local telecommunications service does not include optional toll-free calling outside a local calling scope but within a community of interest, available for an

additional monthly fee or the offering or provision of basic local telecommunications service at private shared-tenant service locations;

7. In summary, the Applicant does not request certificate of service authority to provide basic local telecommunications service. The Applicant states, however, that it intends to provide service that meets the statutory definition of basic local telecommunications service but also states that it does not intend to offer basic local telecommunications service.

WHEREFORE, the Staff requests the Commission to direct the Applicant to explain this inconsistency between the type of service that it intends to provide and the type of certificate of service authority it is requesting.

Respectfully submitted,

/s/ William K. Haas

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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 18th day of January 2008.

/s/ William K. Haas