

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

In the Matter of IntelPeer, Inc.'s Filing to     )  
Introduce Its Intrastate Switched Access     )     File No. IO-2011-0284  
Services Tariff     )

**STAFF MOTION IN SUPPORT OF  
AT&T'S MOTION TO SUSPEND**

**COMES NOW** the Staff of the Missouri Public Service Commission ("Staff") and respectfully requests that the Commission grant AT&T Missouri's Motion to Suspend and Investigate the Switched Access Services Tariff, PSC Mo No. 3, filed by IntelPeer, Inc.

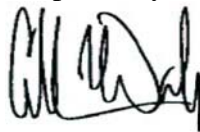
On March 8, AT&T filed its Motion, asserting that:

The proposed tariff is vague and ambiguous in that it inadequately describes the service and how the rates will be applied. As written, the proposed tariff may call for charges to be imposed for access service components not actually provided; proposes excessive rates for 8YY Data Base Queries; and contains provisions allowing IntelPeer to impose charges for services that have not been requested or ordered.

The Staff agrees with AT&T that the proposed tariff has provisions not generally permitted in Missouri telecommunications tariffs. Further, the Staff will need more time to evaluate and request changes, possibly in addition to those that concern AT&T.

**WHEREFORE**, the Staff respectfully requests that the Commission grant AT&T's Motion.

Respectfully submitted,



Colleen M. Dale, Senior Counsel  
Missouri Bar No. 31624  
Attorney for the Staff of the  
Missouri Public Service Commission  
P. O. Box 360  
Jefferson City, MO 65102  
(573) 751-4255 (Telephone)  
[cully.dale@psc.mo.gov](mailto:cully.dale@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 8<sup>th</sup> day of March, 2011.

A handwritten signature in black ink, appearing to be "Allan D. [unclear]".