



Commissioners

SHEILA LUMPE
Chair

M. DIANNE DRAINER
Vice Chair

CONNIE MURRAY

ROBERT G. SCHEMENAUER

KELVIN L. SIMMONS

Missouri Public Service Commission

POST OFFICE BOX 360
JEFFERSON CITY, MISSOURI 65102
573-751-3234
573-751-1847 (Fax Number)
<http://www.psc.state.mo.us>

January 17, 2001

BRIAN D. KINKADE
Executive Director

GORDON L. PERSINGER
Director, Research and Public Affairs

WESS A. HENDERSON
Director, Utility Operations

ROBERT SCHALLENBERG
Director, Utility Services

DONNA M. KOLILIS
Director, Administration

DALE HARDY ROBERTS
Secretary/Chief Regulatory Law Judge

DANA K. JOYCE
General Counsel

Mr. Dale Hardy Roberts
Secretary/Chief Regulatory Law Judge
Missouri Public Service Commission
P. O. Box 360
Jefferson City, MO 65102

RE: Case No. TO-99-593

Dear Mr. Roberts:

Enclosed for filing in the above-captioned case are an original and eight (8) conformed copies of the **PROPOSED LIST OF ISSUES, ORDER OF WITNESSES, ORDER OF CROSS-EXAMINATION AND ORDER OF OPENING STATEMENTS.**

This filing has been mailed or hand-delivered this date to all counsel of record.

Thank you for your attention to this matter.

Sincerely yours,

Nathan Williams
Assistant General Counsel
(573) 751-8702
(573) 751-9285 (Fax)

NW/lb
Enclosure
cc: Counsel of Record

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

FILED²
JAN 17 2001

In the Matter of the Investigation into)
Signaling Protocols, Call Records, Trunk)
Arrangements and Traffic Measurement)

Case No. TO-99-593

Missouri Public
Service Commission

**PROPOSED LIST OF ISSUES, ORDER OF WITNESSES, ORDER OF
CROSS-EXAMINATION AND ORDER OF OPENING STATEMENTS**

COMES NOW the Staff of the Missouri Public Service Commission ("Staff"), on behalf of all other parties to this case, and submits the following Proposed List of Issues, Order of Witnesses, Order of Cross-Examination, and Order of Opening Statements for the evidentiary hearing to be held in this case January 24-26, 2001.

1. This case was established pursuant to the Report and Order that the Missouri Public Service Commission ("Commission") issued on June 10, 1999, in Case No. TO-99-254.

2. The Commission thereafter permitted various parties to intervene and subsequently granted the requests of certain parties for leave to withdraw from the case. The list of parties who remain in this case includes the Staff, the Office of the Public Counsel ("OPC"), and the following intervenors: Southwestern Bell Telephone Company ("SWBT"), the Missouri Independent Telephone Group, f/k/a Mid-Missouri Group ("MITG"), Sprint Missouri, Inc. d/b/a Sprint ("Sprint"), Sprint Communications Company, L.P. ("Sprint, LP"), the Small Telephone Company Group ("STCG"), GTE Midwest Incorporated, d/b/a Verizon Midwest ("Verizon"), Fidelity Telephone Company ("Fidelity"), TCG St. Louis, Inc. ("TCG St. Louis"), and TCG Kansas City, Inc. ("TCG Kansas City").

23

3. On October 10, 2000, the Commission issued its Order Establishing Procedural Schedule. The said Order directed the parties to agree upon and the Staff to file a list of the issues to be heard, the witnesses to appear on each day of the hearing, and the order in which the witnesses shall be called, and the order of cross-examination of each witness. The said Order directed the Staff to file the List of Issues, Order of Witnesses, and Order of Cross-Examination by no later than January 17, 2001.

4. The parties have conferred and have unanimously identified the following list of contested issues, although not all agree every identified issue is a proper subject for decision by the Commission in this case. The parties have unanimously agreed upon the following order of witnesses, order of cross-examination, and order of opening statements.

I. LIST OF CONTESTED ISSUES

The parties have agreed upon the following list of contested issues:

1. Signaling Protocols. Is it necessary for the Commission to decide in this case what signaling protocols should be utilized for intrastate intraLATA traffic terminating over the common trunks between the former PTCs and the former SCs?

2. Traffic Measurement. How and where should intrastate intraLATA traffic terminating over the common trunks between the former PTCs and the former SCs be measured for purposes of terminating compensation?

3. Call Records. What call records should be utilized for intrastate intraLATA traffic terminating over the common trunks between the former PTCs and the former SCs?

4. Trunking Arrangements. What changes, if any, should be made to the existing common trunking arrangements between the former PTCs and the former SCs?

5. Business Relationships. What business relationship should be utilized for payment for intrastate intraLATA traffic terminating over the common trunks between the former PTCs and the former SCs?

6. Call Blocking. What procedure or arrangement, if any, should be utilized to prevent noncompensated intrastate intraLATA traffic from continuing to terminate over the common trunks between the former PTCs and the former SCs?

II. ORDER OF WITNESSES

Set forth below is the anticipated order of appearance of witnesses, along with an estimate as to the day and time each will testify. The parties desire to expedite the hearing and therefore agree to make all of the witnesses available to testify immediately following the conclusion of the testimony by the preceding witness; provided, however, that the cross-examination on the first day of the hearing shall not continue beyond the conclusion of the testimony by SWBT witness Thomas F. Hughes.

- A. STCG Witness**
Robert C. Schoonmaker (Wednesday morning)
- B. MITG Witnesses**
David Jones (Wednesday afternoon)
Kent Larsen (Wednesday afternoon)
- C. SWBT Witnesses**
Thomas F. Hughes (Thursday morning)
Joyce L. Dunlap (Thursday morning)
Richard T. Scharfenberg (Thursday afternoon)
- D. Sprint Witness**
W. Robert Cowdrey (Thursday afternoon)¹

¹ Mr. Cowdrey is only available to testify until 3:00 p.m. on Thursday. The parties have agreed that they will take Mr. Cowdrey's testimony out of turn, if necessary, in order to accommodate his schedule.

E. Verizon Witness
Kathryn Allison (Friday morning)²

F. Staff Witness
Arthur P. Kuss (Friday morning)

III. ORDER OF CROSS-EXAMINATION

The order of cross-examination shall be as follows:

A. STCG Witness

1. MITG
2. OPC
3. Staff
4. Verizon
5. Sprint
6. SWBT

B. MITG Witnesses

1. STCG
2. OPC
3. Staff
4. Verizon
5. Sprint
6. SWBT

C. SWBT Witnesses

1. Verizon
2. Sprint
3. OPC
4. Staff
5. STCG
6. MITG

D. Sprint Witness

1. Verizon
2. SWBT
3. OPC
4. Staff

² Ms. Allison is unavailable to testify after 12:00 p.m. on Friday. The parties have agreed that Ms. Allison may testify out of turn, if necessary, in order to accommodate her schedule.

5. STCG
6. MITG

E. Verizon Witness

1. Sprint
2. SWBT
3. OPC
4. Staff
5. STCG
6. MITG

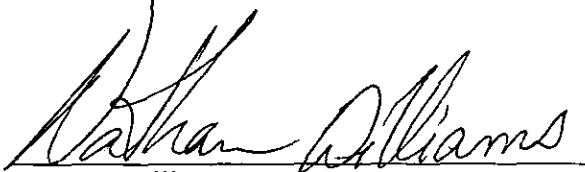
III. ORDER OF OPENING STATEMENTS

The order of opening statements shall be as follows:

- A. STCG**
- B. MITG**
- C. SWBT**
- D. Sprint**
- E. Verizon**
- F. Staff**
- G. OPC**

Respectfully submitted,

DANA K. JOYCE
General Counsel

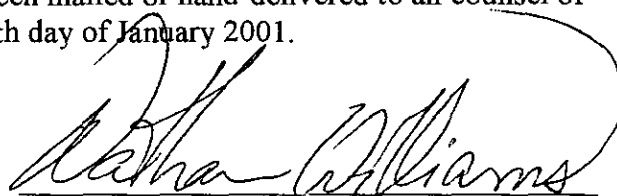
A handwritten signature in cursive script, reading "Nathan Williams", written over a horizontal line.

Nathan Williams
Assistant General Counsel
Missouri Bar No. 35512

Attorney for the Staff of the
Missouri Public Service Commission
P. O. Box 360
Jefferson City, MO 65102
(573) 751-8702 (Telephone)
(573) 751-9285 (Fax)
nwilliam@mail.state.mo.us (E-mail)

Certificate of Service

I hereby certify that copies of the foregoing have been mailed or hand-delivered to all counsel of record as shown on the attached service list this 17th day of January 2001.

A handwritten signature in cursive script, reading "Nathan Williams", written over a horizontal line.

Service List for:

Case No. TO-99-593

Revised: January 17, 2001 (lb)

**Office of the Public Counsel
P.O. Box 7800
Jefferson City, MO 65102**

**W. R. England, III
Brian T. McCartney
Brydon, Swearengen & England P.C.
P.O. Box 456
Jefferson City, MO 65102-0456**

**Paul G. Lane/Katherine C. Swaller/
Leo J. Bub/Anthony Conroy
Southwestern Bell Telephone Company
One Bell Center, Room 3520
St. Louis, MO 63101**

**Paul S. DeFord
Lathrop & Gage
2345 Grand Boulevard, Suite 2500
Kansas City, MO 64108**

**Craig S. Johnson
Andereck, Evans, Milne, Peace & Baumhoer
305 E. McCarty Street, P.O. Box 1438
Jefferson City, MO 65102-1438**

**James M. Fischer
Attorney at Law
101 West McCarty Street, Suite 215
Jefferson City, MO 65101**

**Steve D. Minnis
Sprint Missouri, Inc.
5454 West 110th Street
KSOPKJ0502
Overland Park, KS 66211**

**Steve Minnis/Paul Gardner
131 High Street
Jefferson City, MO 65101**