

BEFORE THE MISSOURI PUBLIC SERVICE COMMISSION

In the matter of Southwestern Bell)	
Telephone, L.P. d/b/a AT&T Missouri's)	Case No. IT-2007-0187
Revision to its General Exchange Tariff,)	Tariff Tracking No. JI-2007-0260
PSC Mo.-No. 35 Regarding Provision of)	
811 Service)	

MISSOURI ONE CALL SYSTEM, INC.'S
STATEMENT OF POSITION ON THE ISSUE

Comes now Missouri One Call System, Inc. (MOCS) and submits its position on the issue in this matter:

Issue: How are the costs associated with implementation of 811 to be recovered?

Position: It is MOCS' position that the costs associated with implementation of 811 should be absorbed by the carriers who have been directed by the Federal Communications Commission (FCC) to implement the service. MOCS' support for this position was set out in its Motion to Suspend and Application to Intervene. MOCS will spotlight here several of the points of the Motion but in preparing this abbreviated statement of position MOCS does not abandon any of the points of argument in its Motion to Suspend. MOCS is the only one call notification center in the State of Missouri. As a consequence, MOCS would be the only "subscriber" to or "customer" of 811 under the proposed AT&T tariffs. MOCS has not requested 811 service from AT&T or any other carrier. MOCS is not under the jurisdiction of the FCC and is not obligated by law or order of any agency to subscribe to the service. Having AT&T and other carriers configure their switches and networks to provide 811 at their own cost is consistent with the intention of the Pipeline Safety Improvement Act of 2002 and the FCC's 6th Report and Order in CC Docket NO. 92-105.

Respectfully submitted,

/s/ Mark W. Comley

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CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the above and foregoing document was sent via e-mail on this 15th day of December, 2006, to General Counsel's Office at gencounsel@psc.mo.gov; Office of Public Counsel at opcservice@ded.mo.gov; and Robert J. Gryzmala, at robert.gryzmala@att.com, attorney for AT&T Missouri.

/s/ Mark W. Comley