

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

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

AT&T MISSOURI'S STATEMENT OF POSITION

AT&T Missouri¹ respectfully submits its Statement of Position in accordance with the Commission's November 16, 2006 Order Granting Intervention, Suspending Tariff, Directing Notice, Setting Prehearing Conference and Setting Evidentiary Hearing. ("Order"). The Order directed that such statement be simple and concise, and free from argument about why the party believes its position to be the correct one. (Order, p. 3).

There is no issue with respect to the terms and conditions of AT&T Missouri's proposed tariff. Additionally, Staff has found the proposed charges to be reasonable,² and Missouri One Call System, Inc. ("MOCS") has confirmed that it will not raise an issue with respect to the reasonableness of those charges. Consequently, there is only one issue in this case.

Issue 1: How are the costs associated with implementation of 811 to be recovered?

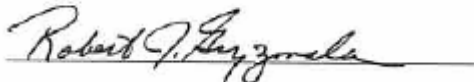
AT&T Missouri's proposed 811 service tariff would offer an abbreviated dialing arrangement (811) that would be used by the Missouri One Call Notification System to provide advance notice of excavation activities to underground facility operators, pursuant to the Pipeline Safety Improvement Act of 2002 and the FCC's implementing order. AT&T Missouri cannot dictate that MOCS use its 811 service. It has no control over whether MOCS may insist on continuing to promote its own 800 number. However, AT&T Missouri's position is that if

¹ Southwestern Bell Telephone, L.P., d/b/a AT&T Missouri ("AT&T Missouri").

MOCS does use the abbreviated dialing arrangement that AT&T Missouri's 811 service tariff would offer, then MOCS must pay for it. An entity subscribing to 811 service must pay for the service, and AT&T Missouri cannot be required to offer a service without compensation. The terms and conditions of the proposed tariff are just and reasonable and the tariff should be approved.

Respectfully submitted,

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² Staff's Response to Motion to Suspend, p. 3.

CERTIFICATE OF SERVICE

Copies of this document were served on the following parties by e-mail on December 15, 2006.


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