

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

In the Matter of Sprint Missouri, Inc.            )	Case No. IO-2006-0092
Application for competitive classification    )	
under Section 392.245.5 RSMo (2005)        )	

**SPRINT'S RESPONSE TO THE OFFICE OF THE PUBLIC COUNSEL'S  
REQUEST FOR SPECIFIC NOTICE TO AFFECTED EXCHANGES AND TO  
ESTABLISH A FORMAL PUBLIC COMMENT PERIOD ON THE  
APPLICATION AND A MOTION FOR EXPEDITED TREATMENT**

COMES NOW Sprint Missouri, Inc. ("Sprint"), and hereby files its Response to the Office of the Public Counsel's Request for Specific Notice and to Establish a Formal Public Comment Period and Motion for Expedited Treatment (Request and Motion). In its Response, Sprint states that there is no justification for public hearings and urges the Commission to deny OPC's Request and Motion.

1. Sprint filed its Application for Competitive Classification in the above mentioned case on August 30, 2005 pursuant to Section 392.245.5 RSMo (2005). Section 392.245.5 RSMo. (2005) allows carriers subject to Price Cap Regulation to seek competitive classification for each telecommunications service offered to business and residential customers, other than exchange access service, in any exchange in which at least two non-affiliated entities are providing local voice service to customers within the exchange.

2. Allowing public comment, as suggested by OPC, will have no bearing on whether two qualifying entities are providing local voice service. Thus, there is no rational basis for a public comment period. The OPC's Request and Motion should be denied.

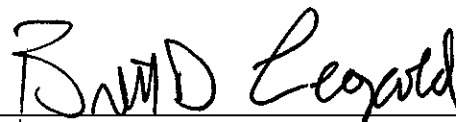
3. The Commission has established a procedural schedule to determine if in fact two qualifying carriers are providing local voice service in the areas for which Sprint seeks competitive classification pursuant to Section 392.245.5 RSMo (205). This procedural process is more than adequate to determine if the statutory criteria have been satisfied. As part of the procedural process, the Commission issued a press release on September 6, 2005 and provided interested parties an opportunity to intervene. OPC will have an opportunity to raise objections and issues regarding whether or not two qualifying carriers are providing local voice service in the exchanges for which Sprint seeks competitive classification.

4. The OPC's Request and Motion is counter to the intent of Section 392.245.5 RSMo. (2005). This section of the statute is intended to provide a clear, simple process for moving to a less-regulated marketplace where competitive alternatives are available. Imposing a public comment period would only serve to needlessly complicate this simple process and increase the cost of regulation.

WHEREFORE Sprint respectfully requests the Commission to deny the OPC's Request and Motion on an expedited basis.

Respectfully submitted,

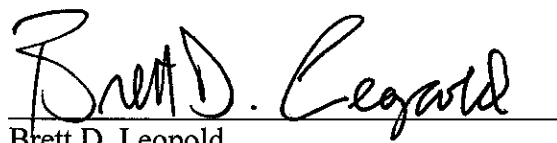
SPRINT

A handwritten signature in black ink, appearing to read "Brett D. Leopold", is written over a horizontal line.

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**VERIFICATION**

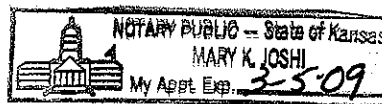
I, Brett D. Leopold, an attorney and duly authorized representative of Sprint Missouri, Inc. hereby verify and affirm that I have read the foregoing Response To The Office Of The Public Counsel's Request For Specific Notice To Affected Exchanges And To Establish A Formal Public Comment Period On The Application And A Motion For Expedited Treatment, and that the statements contained therein are true and correct to the best of my information and belief.

  
Brett D. Leopold

Subscribed and sworn to before me on this 9th day of September, 2005.

  
Notary Public

My Appointment Expires: March 5, 2009



**CERTIFICATE OF SERVICE**

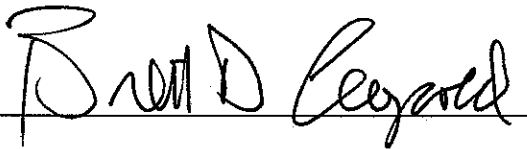
The undersigned hereby certifies that on this 9th day of September, 2005, a copy of the above and foregoing document was served via electronic mail, facsimile or U.S.

Mail, postage prepaid to each of the following:

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