BEFORE THE PUBLIC SERVICE COMMISSION OF THE STATE OF MISSOURI

In the Matter of the Second Investigation)	
into the State of Competition in the Exchanges of)	Case No. TO-2005-0035
Southwestern Bell Telephone, L.P., d/b/a)	
SBC Missouri.)	

SBC MISSOURI'S MOTION FOR LEAVE TO CORRECT TESTIMONY AND TO SUPPLY INADVERTENTLY OMITTED SCHEDULES

SBC Missouri¹ respectfully requests the Commission to grant it leave to substitute corrected pages from certain portions of its Direct Testimony filed Friday, October 29, 2004, and to supply a signature page and a schedule that was inadvertently omitted from that filing.

- 1. SBC Missouri discovered that the individual pages from Schedule 6B of SBC Missouri witness Sandy Moore's Direct Testimony Schedule 6B were not labeled as Schedule 6B. SBC Missouri seeks leave to substitute a corrected version of Schedule 6B that contains the correct designation. (A copy of this corrected schedule is being filed with this Motion. The .pdf file being filed in EFIS is labeled "Schedule 6B corrected." The hardcopy pages display the footer "Schedule 6B.")
- 2. SBC Missouri discovered that it inadvertently omitted Schedule 8B from SBC Missouri witness Sandy Moore's Direct Testimony. This schedule contains copies of various pages from CLEC Missouri tariffs. SBC Missouri seeks leave to file this schedule out of time. (A copy of this Schedule is being filed with this Motion.)

¹ Southwestern Bell Telephone, L.P., d/b/a SBC Missouri, will be referred to in this pleading as "SBC Missouri."

- 3. SBC Missouri discovered that the cover sheets for SBC Missouri witness Sylvia Fernandez's Direct Testimony (NP, P and HC) designated her issue as "Policy." It should have stated "Business Services." SBC Missouri seeks leave to correct this designation by filing corrected cover pages. (Corrected cover sheets are being filed with this Motion and the pages are noted as "Corrected.")
- 4. SBC Missouri discovered that the signature page from SBC Missouri witness Sylvia Fernandez' Direct Testimony was inadvertently omitted from the filing.

 SBC Missouri seeks leave to correct this omission by filing Ms. Fernandez' signature page out of time. (A copy of Ms. Fernandez' signature page Affidavit is being filed with this Motion.)
- 5. SBC Missouri discovered that the NP version of Schedule 5P from SBC Missouri witness Sylvia Fernandez' Direct Testimony incorrectly stated that the contents of the classified schedule was "highly confidential." It should have said that it was "proprietary." SBC Missouri seeks leave to correct this designation by filing a corrected NP version of Schedule 5P. (A corrected copy of the NP version of Schedule 5P is being filed with this Motion and is noted as "Corrected.")

For the most part, these corrections are administrative in nature (the only substantive addition is Schedule 8B to Ms. Moore's testimony, which is merely pages from Commission-approved state tariffs). Other parties' Rebuttal testimony is not due to be filed until December 17, 2004. Accordingly, the Commission's granting SBC Missouri leave to make these corrective filings should not prejudice any party to this proceeding.

WHEREFORE, SBC Missouri respectfully requests the Commission grant SBC

Missouri leave to file these corrections and inadvertently omitted schedules, and to accept them for filing in this case.

Respectfully submitted,

SOUTHWESTERN BELL TELEPHONE, L.P. D/B/A SBC MISSOURI

PAUL G. LANE #27011 LEO J. BUB #34326 ROBERT J. GRYZMALA #32454 MIMI B. MACDONALD #37606

Attorneys for SBC Missouri One SBC Center, Room 3520

St. Louis, Missouri 63101

314-235-2508 (Telephone)/314-247-0014(Facsimile) leo.bub@sbc.com

CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing document were served to all parties by e-mail on November 4, 2004.

Leo J. Bub

GENERAL COUNSEL WILLIAM HAAS MISSOURI PUBLIC SERVICE COMMISSION PO BOX 360 JEFFERSON CITY, MO 65102

SHELDON K. STOCK, ESQ. GREENSFELDER,HEMKER & GALE, P.C. 10 SOUTH BROADWAY, SUITE 2000 ST. LOUIS, MO 63102

MARK W. COMLEY NEWMAN, COMLEY & RUTH P.C. 601 MONROE STREET, SUITE 301 PO BOX 537 JEFFERSON CITY, MO 65102 PUBLIC COUNSEL MICHAEL F. DANDINO OFFICE OF THE PUBLIC COUNSEL PO BOX 7800 JEFFERSON CITY, MO 65102

CARL J. LUMLEY LELAND B. CURTIS CURTIS OETTING HEINZ GARRETT & SOULE, P.C. 130 S. BEMISTON, SUITE 200 ST. LOUIS, MO 63105