

BEFORE THE PUBLIC SERVICE COMMISSION  
FOR THE STATE OF MISSOURI

In the Matter of a Further Investigation of )  
the Metropolitan Calling Area Service After ) Case. No. TO-2001-391  
the Passage and Implementation of the )  
Telecommunications Act of 1996. )

**SOUTHWESTERN BELL TELEPHONE, L.P.**  
**d/b/a SOUTHWESTERN BELL TELEPHONE COMPANY'S**  
**MOTION FOR LEAVE TO FILE ITS REPLY BRIEF**  
**ONE DAY OUT OF TIME**

Comes now, Southwestern Bell Telephone, L.P., d/b/a Southwestern Bell Telephone Company ("SWBT") and, for its Motion for Leave to File its Reply Brief One Day Out of Time, states as follows:

1. On Friday, August 23, 2002, both the Missouri Public Service Commission ("Commission") Data Center and Judge Roberts informed SWBT that since it was submitting its pleadings using the Electronic Filing & Information System ("EFIS"), SWBT no longer needed to submit paper copies of pleadings to the Commission.

2. On Monday, August 26, 2002, SWBT made multiple attempts to submit its Reply Brief in the above-captioned matter using EFIS. However, despite SWBT's attempts, EFIS would not accept the filing.

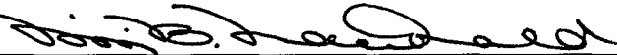
3. After 4:00 p.m. on Monday, August 26, 2002, counsel for SWBT contacted Judge Ruth to advise her that EFIS would not accept SWBT's Reply Brief and to ask her how she would like SWBT to proceed. Judge Ruth confirmed that the Commission was experiencing problems with EFIS. She requested SWBT to file this Motion for Leave to File Its Reply Brief One Day Out of Time.

4. No party will be prejudiced if the Commission grants SWBT's Motion for Leave to File its Reply Brief One Day Out of Time because SWBT e-mailed a copy of its Reply Brief to each of the parties, as well as to Judge Ruth.

Wherefore, Southwestern Bell Telephone, L.P., d/b/a Southwestern Bell Telephone Company prays that the Commission grant its Motion for Leave to File Its Reply Brief One Day Out of Time, together with any further and additional relief the Commission deems just and proper.

Respectfully submitted,

SOUTHWESTERN BELL TELEPHONE COMPANY

By 

PAUL G. LANE #27011

LEO J. BUB #34326

ANTHONY K. CONROY #35199

MIMI B. MACDONALD #37606

Attorneys for Southwestern Bell Telephone Company

One Bell Center, Room 3520

St. Louis, Missouri 63101

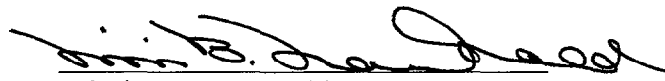
314-235-4094 (Telephone)

314-247-0014 (Facsimile)

[mimi.macdonald@sbc.com](mailto:mimi.macdonald@sbc.com) (E-mail)

**CERTIFICATE OF SERVICE**

Copies of this document were served on the following parties by e-mail on August 27, 2002.



Mimi B. MacDonald

CAROL POMPONIO  
NEXTLINK MISSOURI, INC.  
2020 WATERPORT CENTER DRIVE  
MARYLAND HEIGHTS, MO 63146  
[cpomponio@nextlink.com](mailto:cpomponio@nextlink.com)

CARL LUMLEY  
LELAND B. CURTIS  
CURTIS OETTING HEINZ GARRETT  
& SOULD, P.C.  
130 S. BEMISTON, STE. 200  
ST. LOUIS, MO 63105  
[clumley@cohgs.com](mailto:clumley@cohgs.com)

THOMAS E. PULLIAM  
OTTSEN, MAUZE, LEGGAT & BELZ, L.C.  
112 SOUTH HANLEY  
ST. LOUIS, MO 63105-3418  
[TEPulliam@aol.com](mailto:TEPulliam@aol.com)

WILLIAM R. ENGLAND, III  
BRYDON, SWEARENGEN & ENGLAND  
PO BOX 456  
JEFFERSON CITY, MO 65102  
[trip@brydonlaw.com](mailto:trip@brydonlaw.com)

EDWARD CADIEUX  
CAROL KEITH  
GABRIEL COMMUNICATIONS, INC.  
16090 SWINGLEY RIDGE RD., SUITE 500  
CHESTERFIELD, MO 63006  
[ckeith@nuvox.com](mailto:ckeith@nuvox.com)  
[ecadieux@nuvox.com](mailto:ecadieux@nuvox.com)

CHARLES W. MCKEE  
Sprint SPECTRUM LP  
4900 MAIN STREET  
KANSAS CITY, MO 64112  
[Charles.McKee@mail.sprint.com](mailto:Charles.McKee@mail.sprint.com)

J STEVE WEBER  
101 W. MCCARTY, SUITE 216  
JEFFERSON CITY, MO 65101  
[jsweber@att.com](mailto:jsweber@att.com)

JAMES M. FISCHER  
FISCHER & DORITY PC  
101 MADISON STREET, SUITE 400  
JEFFERSON CITY, MO 65101  
[jfischerpc@aol.com](mailto:jfischerpc@aol.com)

LELAND B. CURTIS  
CURTIS OETTING HEINZ  
GARRETT & SOULE, P.C.  
130 S. BEMISTON, SUITE 200  
ST. LOUIS, MO 63105  
[lcurtis@cohgs.com](mailto:lcurtis@cohgs.com)

MARY ANN YOUNG  
2031 TOWER DRIVE  
P.O. BOX 104595  
JEFFERSON CITY, MO 65102-4395  
[MYoung0654@aol.com](mailto:MYoung0654@aol.com)

CHARLES BRENT STEWART  
STEWART & KEEVIL, L.L.C.  
1001 CHERRY STREET, SUITE 302  
COLUMBIA, MO 65201  
[stewart499@aol.com](mailto:stewart499@aol.com)

CRAIG S. JOHNSON  
ANDERECK, EVANS, MILNE, PEACE  
& JOHNSON, LLC  
P. O. BOX 1438  
JEFFERSON CITY, MO 65102  
[cjohnson@aempb.com](mailto:cjohnson@aempb.com)

LISA CREIGHTON HENDRICKS  
SPRINT MISSOURI, INC.  
6450 SPRINT PARKWAY  
KSOPHN0212-2A253  
OVERLAND PARK, KS 66251  
[Lisa.C.CreightonHendricks@mail.sprint.com](mailto:Lisa.C.CreightonHendricks@mail.sprint.com)

BRADLEY R. KRUSE  
MCLEODUSA TELECOMMUNICATIONS  
SERVICES, INC.  
P.O. BOX 3177  
CEDAR RAPIDS, IA 52406-3177  
[bkruse@McLeodUSA.com](mailto:bkruse@McLeodUSA.com)

STEPHEN F. MORRIS  
MCI TELECOMMUNICATIONS CORP.  
701 BRAZOS, SUITE 600  
AUSTIN, TX 78701  
[stephen.morris@wcom.com](mailto:stephen.morris@wcom.com)

MARK W. COMLEY  
NEWMAN COMLEY & RUTH, P.C.  
P.O. BOX 537  
JEFFERSON CITY, MO 65102-0537  
[comleym@ncrpc.com](mailto:comleym@ncrpc.com)

PETE MIRAKIAN, III  
1000 WALNUT STREET, SUITE 1400  
KANSAS CITY, MO 64106-2140  
[pmirakian@spencerfane.com](mailto:pmirakian@spencerfane.com)

NANCY KRABILL  
XO MISSOURI, INC.  
1300 W. MOCKINGBIRD LANE, STE. 200  
DALLAS, TX 75247  
[Nancy.krabill@xo.com](mailto:Nancy.krabill@xo.com)

THOMAS R. PARKER  
VERIZON  
601 MONROE STREET  
SUITE 304  
JEFFERSON CITY, MO 65101  
[tom.parker@verizon.com](mailto:tom.parker@verizon.com)

REBECCA B. DECOOK  
1875 LAWRENCE STREET  
SUITE 1575  
DENVER, CO 80202  
[decook@att.com](mailto:decook@att.com)