



Leo J. Bub
General Attorney

AT&T Missouri
One AT&T Center
Room 3518
St. Louis, Missouri 63101

T: 314.235.2508
F: 314.247.0014
leo.bub@att.com

January 3, 2011

Mr. Steven C. Reed
Secretary of the Commission
Missouri Public Service Commission
P.O. Box 360
Jefferson City, Missouri 65102

Re: Case No. TX-2011-0099 (CLEC Financial Test)

Dear Mr. Reed:

Please accept this letter as Southwestern Bell Telephone Company, d/b/a AT&T Missouri's ("AT&T Missouri's") comments on the Missouri Public Service Commission's ("Commission's") proposed rule changes to simplify the application process for a certificate of service authority to provide basic local exchange service.

AT&T Missouri supports the Commission's proposed rule revisions. In AT&T Missouri's view, the proposed changes appropriately balance the Commission's goal of streamlining the certificate application process with the interests of other telecommunications carriers providing service in the state. New entrants frequently seek to provide service by reselling the telecommunications services of another carrier. In the event the new entrant becomes insolvent or bankrupt, the underlying carrier actually providing the service often does not receive payment for its services, as it is treated as an unsecured creditor. The Commission's provisions in the proposed rule to determine the stability or viability of the new entrant at the time of certification should help provide some protection to existing carriers from this exposure.

We appreciate your bringing these comments to the Commission's attention.

Very truly yours,

Leo J. Bub

cc: MoPSC General Counsel
Public Counsel