

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

In the Matter of Sprint Communications       )  
Company L.P.'s Filing to Introduce New       )  
Access Service and Revise Its Access       )  
Service Tariff.                                       )  
Case No. \_\_\_\_\_

**AT&T'S MOTION TO SUSPEND  
AND INVESTIGATE TARIFF**

AT&T Communications and AT&T Missouri (collectively, the "AT&T Companies"),<sup>1</sup> pursuant to 4 CSR 240-2.065(3) and 4 CSR 240.2-075(2), respectfully request the Missouri Public Service Commission ("Commission") to suspend and investigate a tariff filed by Sprint Communications Company L.P. ("Sprint") to introduce Toll Free Transit Traffic Service and make other revisions to its Access Service Tariff<sup>2</sup>.

1.     Background on Movants. AT&T Communications is a Delaware corporation, duly authorized to conduct business in Missouri with its principal Missouri office located at 2121 East 63rd Street, Kansas City, Missouri 64130. AT&T Communications is an "interexchange telecommunications company," an "alternative local exchange telecommunications company," and a "public utility," and is duly authorized to provide "telecommunications service" within the State of Missouri as each of those phrases is defined in Section 386.020 RSMo (2006 C. Supp.).

2.     AT&T Missouri is a Missouri corporation duly authorized to conduct business in Missouri with its principal Missouri office located at One AT&T Center, 35th Floor, St. Louis, Missouri 63101. AT&T Missouri is a "local exchange telecommunications company" and a

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<sup>1</sup> AT&T Communications of the Southwest, Inc. will be referred to in this pleading as "AT&T Communications;" and Southwestern Bell Telephone Company, d/b/a AT&T Missouri, will be referred to in this pleading as "AT&T Missouri."

<sup>2</sup> AT&T is in discussions with Sprint to see if the issues can be resolved. However, it is doubtful that a resolution will be reached by the proposed effective date of the tariff. AT&T is filing this motion to suspend at this time to ensure the Commission has sufficient time to act.

“public utility,” and is duly authorized to provide “telecommunications service” within the State of Missouri as each of those phrases is defined in Section 386.020 RSMo (2006 C. Supp.).

3. All correspondence, pleadings, orders, decisions and communications regarding this proceeding should be sent to:

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Robert J. Gryzmala  
Attorneys for AT&T Communications of the Southwest, Inc.; and  
Southwestern Bell Telephone Company, d/b/a AT&T Missouri  
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4. Sprint’s Tariff Filing. On August 20, 2009, Sprint filed revised tariff sheets for its Access Service Tariff, Missouri P.S.C. Tariff No. 5 to add Toll Free 8YY Transit Traffic Service and make other revisions to that tariff.<sup>3</sup>

5. As the Commission well knows, the present intercompany compensation system is broken and has long been in need of reform. The FCC has been investigating intercompany compensation issues for years but has yet to make any meaningful changes. While a states’ ability to reform intercompany compensation is limited by its jurisdictional nature<sup>4</sup>, states do maintain an important role to do what they can to ensure matters do not get worse while work continues on broad reform. Sprint’s proposed filing may make matters worse and, as such, should be investigated.

6. Another important point about intercompany compensation is that, in many cases, and in particular with Sprint’s proposed offering, companies are unable to avoid the charges assessed by other companies. In the case of Sprint’s proposed Toll Free (8YY) Transit Traffic Service, the company providing the 8YY service (e.g., AT&T) to the end user customer is unable

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<sup>3</sup> A copy of Sprint’s proposed tariff filing is appended as Attachment 1.

<sup>4</sup> States can, however, address compensation issues within their jurisdiction. For example, states can address intrastate switched access reform to reduce and eliminate the implicit subsidies that are no longer sustainable in intrastate switched access charges.

to avoid Sprint's proposed charges. AT&T and other 8YY providers have no choice but to pay Sprint's charges for an 8YY call coming through Sprint's network. And obviously, in turn, AT&T's and other carriers' customers have to bear that cost. As such, the Commission should ensure that such charges and practices are reasonable, follow industry requirements, and do not exceed statutory limitations.

7. Sprint's filing raises the following issues and concerns:

(a) Use of Industry Standard MECAB Billing Guidelines.

AT&T's first concern relates to the Toll Free (8YY) Transit Traffic Service. This Service is a jointly provided access service in which Sprint transports toll free traffic originated by a third party who is not an end user of Sprint's local exchange or exchange access service through its wire center to an Interexchange Carrier ("IXC") customer. The rate for this Service is usage sensitive.

Sprint needs to make clear in its proposed tariff that in providing Toll Free (8YY) Transit Traffic Service, it will comply with industry standards, specifically the Ordering and Billing Forum's Multiple Exchange Carrier Access Billing ("MECAB") Guidelines. While Sprint's Access Service Tariff may contain references to the MECAB guidelines, additional language is needed to make these industry standards applicable to the proposed service.

Sprint must also confirm that the third Party providers will comply with MECAB.

According to the MECAB guidelines, all providers on the route must agree to comply with MECAB prior to implementation. Lack of agreement with the third Parties will likely result in inaccurate billing and allow such third Parties to send traffic originating outside the LATA and/or state to the AT&T Incumbent Local Exchange Carrier ("ILEC"), in this case AT&T Missouri, for hand-off to an IXC, which is in clear violation of AT&T's switched access tariff. In addition, when Sprint is jointly providing this Service with more than one LEC, it is important that all involved LECs agree

on a billing arrangement which is consistent with MECAB guidelines and AT&T's switched access tariff.<sup>5</sup> Moreover, the Proposed Tariff needs to be revised to make clear that there should be coordination and record exchange requirements among the LECs involved in jointly provisioning switched access in connection with Sprint's Toll Free (8YY) Transit Traffic Service under the Proposed Tariff. The tariff should also contain call flow diagrams to show how the responsibilities of all carriers providing service on the call route are delineated, and which one is entitled to payment for each function performed on the call route.

(b) Proposed Direct Connect Charge appears Unreasonable.

The proposed tariff specifies that IXC's are provided the option to either directly connect or indirectly connect to the company's (i.e. Sprint's) switch via a Direct End Office Trunk (DEOT). See Section 6.1.2(D). AT&T interprets this section to mean that tandem transport usage is not involved with this routing option. However, directly below this paragraph, at Section 6.1.2(D)(1), and also in Section 8.2.8, Sprint proposes to charge tandem transport rate elements such as: one-half Tandem Transport Termination (fixed), Tandem Transport Mileage (1 mile), Tandem Switching, and one-half Common Transport multiplexing. These tandem transport elements should not apply if, as indicated above, Sprint's DEOT would not involve any tandem transport function performed by Sprint. Sprint should be compensated only for the functions it performs.

Another related matter is that at Section 6.1.2(B), Sprint describes separately Local Switching Service (Direct and Indirect) to include several composite functions, however it is not clear how the described elements relate to Sprint's Toll Free 8YY Transit Traffic Service which is the focus of this new tariff. This service appears to have existed prior to the introduction of this new service, but Sprint needs to explain or expressly state under what types of traffic arrangement the

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<sup>5</sup> See Section 2.4.5, et seq., of AT&T Missouri's Access Services Tariff, P.S.C. Mo.-No. 36, effective April 11, 1993.

applicable rates would be charged or whether those rates are applicable in addition to the new Toll Free 8YY Transit Traffic Service; and, if they do not apply at all, the tariff should explicitly state so.

AT&T is also concerned that, as described in Section 6.1.2 (D) of the proposed tariff the functions that would be performed under Direct Connect and Indirect Connect are the same, however the rates proposed in Section 8.2.8 are different – there is no explanation for what caused the rate differential.

(c) Disaggregation Needed to Avoid Overbilling.

The tariff contains some aggregated rates that combine multiple rate elements. For example, Local Switching (Section 8.2.7), Carrier Common Line (“CCL”) (Section 8.2.7), Toll Free 8YY Transit Traffic – Direct and Indirect Connect (Section 8.2.8) all combine multiple elements into a single rate element. For the most part, either the elements that make up the aggregated rate were not provided, or the method used to calculate the blended rate was not explained. At a minimum, these rates should be disaggregated to ensure that only those parts of the blended rate applicable to particular traffic arrangements are charged. Without disaggregating, it would be impossible to ensure Sprint does not charge for services or functions it does not perform or to ensure that Sprint’s access rates do not exceed those of the incumbent LEC with whom Sprint is competing, as required by Section 392.361.6 RSMo.

(d). Network Aggregation.

In principle, network traffic aggregation can reduce costs for carriers and should benefit end users. It is an attractive alternative to reduce costs that mitigates establishing multiple points of interface and the supporting interconnection facilities in and across LATAs between carriers. However, Sprint’s new 8YY aggregation services will drive a higher cost per call for 8YY

service compared to the same access and query services currently provided today. 8YY traffic aggregation should only make sense and should only be supported if the cost per call at least mirrors, if not reduces, incumbent rates across Missouri. A proposal whose intent is to route traffic across the state from low cost to high cost access providers with absolutely no benefit provided to the end user customer should not be permitted.

(e) Network Aggregation -- Rate Review Consideration.

Sprint's proposal also has an impact on IXC costs through the application of Sprint's previously filed tariff for 8YY query charge. The Commission should evaluate how the application of these existing rates are impacted by Sprint's current proposed tariff and 8YY aggregated traffic. Sprint cost models utilized to support these new service rates and existing 8YY query rates should be reviewed to ensure they correctly reflect the impact of lower unit costs driven by larger traffic volumes attributable to traffic aggregation.

(f) ICB Pricing References for Common Access Services.

Common switched access services for transport facilities and dedicated trunk ports are usually not based on and/or subject to ICB pricing. AT&T questions the appropriateness of ICB based pricing associated with this tariff and the references made therein. Further definition and specific element pricing is required to ensure the accuracy of the rates and services provided in this filing.

(g) Jurisdiction Discernment for Aggregated 8YY Calls.

The filing does not include any information to ensure Intrastate 8YY toll free calls are accurately jurisdictionalized and billed correctly.

When a carrier, such as Sprint CLEC, aggregates toll-free calls, it does not know the destination of that call. It therefore cannot determine the jurisdiction of calls from its own call

records whether a toll-free call is Interstate or Intrastate. This issue exists for all toll-free traffic across the industry. Sprint CLEC must rely on jurisdictional reports provided by AT&T, an 8YY service provider, to classify traffic and bill appropriate Intrastate rates.

Jurisdictional reports produced by AT&T for Sprint CLEC will not include any third party aggregated 8YY traffic associated with this new service. Call records for 8YY originated traffic only identify the originating carrier of a call. As a result, toll-free traffic aggregated from other carriers in or out of the state of Missouri will not be reflected accurately in Sprint CLEC jurisdictional reports.

This filing must define how Sprint CLEC will accurately account for and jurisdictionalize third party Intrastate 8YY aggregated traffic supported by this service, so that the proposed intrastate 8YY rates are not applied to interstate traffic.

8. Although Sprint claims it is introducing its 8YY Transit Traffic Service as a new service, this type of function is not new to the industry. It is being offered today by other Telecommunications carriers at much lower cost to AT&T and other IXC's. It is unreasonable that Sprint can inject itself into an existing call flow and drive higher AT&T's cost when AT&T cannot reject Sprint's offering because of regulatory restrictions prohibiting call blocking, and AT&T could not choose to stay with the existing lower cost 8YY aggregation function offered by Sprint's competitors. Sprint should not be allowed to take advantage of the fact that AT&T and other IXC's are captive customers in this type of network setup. Sprint's attempt to impose added and unneeded costs through this tariff filing will, if permitted, only put upward pressure on retail end users toll prices.

9. The AT&T Companies' interests as telecommunications service providers differ from those of the general public. AT&T Communications pays Sprint both originating and

terminating intrastate switched access rates on intrastate interexchange calls placed by their customers. AT&T Missouri pays Sprint intrastate terminating switched access rates to terminate intrastate interexchange calls placed by AT&T Missouri's customers and may be required to pay originating intrastate switched access under the proposed tariffs. The AT&T Companies have a significant financial interest in ensuring that Sprint's intrastate switched access rates are lawful and appropriate. No other party to this proceeding will adequately protect the AT&T Companies' interests.

10. Granting of this intervention will be in the public interest because the AT&T Companies will bring to this proceeding their experience as telecommunications providers and their expertise in analyzing tariffs, which should assist the Commission in its review of Sprint's filing.

WHEREFORE the AT&T Companies respectfully request the Commission to suspend Sprint's proposed tariff filing for investigation.

Respectfully submitted,

AT&T COMMUNICATIONS OF THE SOUTHWEST  
INC., and  
SOUTHWESTERN BELL TELEPHONE COMPANY,  
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Issue Date:  
August 20, 2009

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Effective Date:  
October 1, 2009

## ACCESS SERVICE

6. Switched Access Service (Cont'd)6.1 General (Cont'd)6.1.2 Rate Categories (Cont'd)(A) Switched Transport (Cont'd)(4) Chargeable Optional Features(a) Multiplexing

Multiplexing provides for arrangements to convert a single higher capacity or bandwidth circuit for bulk transport to several lower capacity or bandwidth circuits. Multiplexing is only available at Company designated Hubs (end offices) arranged for multiplexing or at the access tandem trunk on the serving wire center side of the access tandem. All Types of multiplexing may not be available at each Hub location.

Listed below are the multiplexing arrangements offered with switched access.

(1) DS3 to DS1

An arrangement that multiplexes twenty-eight DS1 digital circuits to a single DS3 digital circuit at rate of 44.736 Mbps, or multiplexes a single DS3 digital circuit at a rate of 44.736 Mbps to twenty-eight DS1 digital circuits.

The rates and charges for multiplexing are located in section 8 following.

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Issue Date:  
August 20, 2009

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Effective Date:  
October 1, 2009

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6. Switched Access Service (Cont'd)6.1 General (Cont'd)6.1.2 Rate Categories (Cont'd)(B) Local Switching

The Local Switching rate element provides for the use of end office switching equipment for the termination of end user lines in the local end office, and for the termination of a call at a Company operator or recording.

(1) Direct Connect

This is a Composite rate and is comprised of the following rate elements: Common Carrier Line (CCL) and End Office Charges which include Local Switching and Common Trunk Port.

(2) Indirect Connect

This is a Composite rate comprised of the following rate elements: Common Carrier Line (CCL) and End Office Charges which include Local Switching and Common Trunk Port; Tandem Switched Transmission, which include Tandem Transport Termination (fixed), Tandem Transport Mileage (per mile); and Common Transport Multiplexing.

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Issue Date:  
August 20, 2009

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Effective Date:  
October 1, 2009

## ACCESS SERVICE

6. Switched Access Service (Cont'd)6.1 General (Cont'd)6.1.2 Rate Categories (Cont'd)(C) 900 Access Service Nonrecurring Charges

The 900 Access Service nonrecurring charge is assessed depending upon how the service is ordered:

- (1) If the service is ordered to only one end office performing six digit screening, the customer charge for the assembly of route tables is assessed for each end office subtending the access tandem. A second nonrecurring charge element applies per NXX activated or deactivated, times the designated Company end office(s) modified to perform six digit screening for 900 Access Service. This option can be applied repetitively to different tandems to customize the intended offering area.

The route pattern nonrecurring charge applies only once, on the customer's initial request to the Company for 900 Access Service for each end office

(D) Toll Free Database Access Service (TFDBAS)

The Toll Free Database Access Service (TFDBAS) Database Query Charge will apply for each (TFDBAS) call query received at the Company's Toll Free SMS800 database. Per query charges will be accumulated over a monthly period and billed to the customer on a monthly basis.

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(M) Text previously located on this page now appears on Original Page 6-11.2.

Issue Date:  
August 20, 2009

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Effective Date:  
October 1, 2009

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6. Switched Access Service (Cont'd)

(N)

6.1 General (Cont'd)6.1.2 Rate Categories (Cont'd)(D) Toll Free 8YY Transit Traffic Service

Toll Free 8YY Transit Traffic Service is an access service in which the company transports Toll Free traffic originated by a third party that is not an end user or other user of the Company's local exchange or exchange access service through its wire center to an Interexchange Carrier Customer. The connection can be either directly via a Direct End Office Trunk (DEOT) from the company's switch to the IXC or indirectly via another LEC tandem switch.

(1) Direct Connect

This rate is in addition to the Toll Free Database Access Service described in Section 6.2.2. Toll Free Transit Service Direct Connect provides for the use of Tandem Switching; and appropriate portions of Tandem Switched Transmission, which includes Tandem Transport Termination (fixed) and Tandem Transport Mileage (per mile); and Common Transport Multiplexing.

(2) Indirect Connect

This rate is in addition to the Toll Free Database Access Service described in Section 6.2.2. Toll Free Transit Service Indirect Connect provides for the use of Tandem Switched Transmission, which includes Tandem Transport Termination (fixed) and Tandem Transport Mileage (per mile); Tandem Switching and Common Transport Multiplexing.

(N)

## ACCESS SERVICE

6. Switched Access Service (Cont'd)6.1 General (Cont'd)6.1.3 Ordering Options and Conditions

Switched Access Service is ordered under the Access Order provisions set forth in 5 preceding. Also, included in that section are other charges which may be associated with ordering Switched Access Service (e.g., Service Date Change Charges, etc.).

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Issue Date:  
August 20, 2009

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Effective Date:  
October 1, 2009

## ACCESS SERVICE

6. Switched Access Service (Cont'd)6.2 Provision and Description of Switched Access Service Arrangements (Cont'd)6.2.2 Toll Free Database Access Service (TFDBAS) (Cont'd)(A) Description (Cont'd)

Unless prohibited by network considerations (e.g., different dialing plans), the customer's Toll Free Database Access Service (TFDBAS) traffic may, at the option of the customer, be combined in the same trunk group arrangement with the customer's non toll free database switched access traffic except as follows. Combining Toll Free Database Access Service traffic with the customer's direct routed switched access traffic will be allowed only when the end office is equipped to perform the toll free database query. When required by network considerations, a separate trunk group must be established for Toll Free Database Access Service.

(C)  
(C)  
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(C)

When Toll Free traffic is combined in the same trunk group arrangement with other traffic, usage for the Toll Free Database Access Service traffic will be aggregated with the other traffic for billing purposes. When separate trunk groups are provided for Toll Free Database Access Service, usage will be provided separately.

The Federal Communications Commission ("FCC") has concluded that hoarding, defined as the acquisition of more Toll Free numbers than one intends to use for the provision of Toll Free service, as well as the sale of Toll Free numbers by a private entity for a fee, is contrary to the public interest in the conservation of the scarce Toll Free number resource and contrary to the FCC's responsibility to promote the orderly use and allocation of Toll Free numbers.



Sprint Communications Company L.P.

Missouri P.S.C. Tariff No. 5

1st Revised Page 8-2

Cancels Original Page 8-2

# ACCESS SERVICE RATES AND CHARGES

## 8. Rates and Charges (Cont'd)

8.2	<u>Switched Access Service</u>	Nonrecurring Installation <u>Charges</u>	Nonrecurring Rearrangement <u>Charges</u>	
8.2.1	<u>Switched Transport - Entrance Facilities</u>			
(A)	DS1	\$400.00		
	DS1 Switched Transport Entrance Facilities monthly rate is provided on an Individual Case Basis (per DS1).			(C) (C)
(B)	DS3	\$500.00	\$250.00	
	DS3 Switched Transport Entrance Facilities monthly rate is provided on an Individual Case Basis (per DS3).			(C) (C)
8.2.2	<u>Switched Transport - Direct-Trunked Transport</u>			
(A)	DS1			
	DS1 Direct-Trunked Transport is provided on an Individual Case Basis.			(C) (C)
(B)	DS3			
	DS3 Direct-Trunked Transport is included provided on an Individual Case Basis.			(C) (C)
8.2.3	<u>Switched Transport - Tandem Switched Transport</u>			
(A)	<u>Transport</u>			
	The Transport rate element is provided on an Individual Case Basis.			(C)
(B)	<u>Tandem-Switched Transmission</u>			
	Tandem-Switched Transmission is included in the Local Switching Indirect Connect and Toll Free 8YY Transit Traffic Service rate.			(C)
(C)	<u>Switched Transport - Tandem Switching</u>			
	Tandem-Switching is included in the Toll Free 8YY Transit Traffic Service rates.			(C) (C)

Issue Date:  
August 20, 2009

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October 1, 2009

ACCESS SERVICE  
RATES AND CHARGES8. Rates and Charges (Cont'd)8.2 Switched Access Service (Cont'd)8.2.3 Switched Transport - Tandem Switched Transport (Cont'd)(D) Common Transport Multiplexing

Common Transport Multiplexing is included in the Local Switching Indirect Connect and Toll Free 8YY Transit Traffic Service rates.

(C)

(E) Common Trunk Port

The Common Trunk Port is included in the Local Switching rate element.

(F) Dedicated Trunk Port

DS1

The DS1 Dedicated Trunk Port is not included in any rate element, and will be provided on an Individual Case.

(C)  
(C)8.2.4 Switched Transport - Optional FeaturesMultiplexing

DS3 to DS1

DS3 to DS1 Multiplexing is not included any rate element, and will be provided on an Individual Case Basis..

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Issue Date:  
August 20, 2009

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October 1, 2009

# ACCESS SERVICE RATES AND CHARGES

## 8. Rates and Charges (Cont'd)

### 8.2 Switched Access Service (Cont'd)

#### 8.2.7 Local Switching

(M)

Local Switching is a composite rate.

Direct Connect Rate\* (C)  
Per Access Minute (C)

Indirect Connect Rate \*\* (C)  
Per Access Minute

\$0.015855 (R)

\$0.023336

#### 8.2.6 Installation

Nonrecurring  
Charges

Per Line or Trunk

\$52.00

#### 8.2.7 Carrier Common Line Access Service

Carrier Common Line is included in the Local Switching Rate Element.

(M)

\* Local Switching Direct Connect is comprised of the following rate elements: Common Carrier Line (CCL) and End Office Charge which includes Local Switching and Common Trunk Port.

(N)

\*\* Local Switching Indirect Connect is comprised of the following rate elements: Common Carrier Line (CCL); End Office Charge which includes Local Switching and Common Trunk Port; Tandem Switched Transmission, which includes Tandem Transport Termination (fixed) and Tandem Transport Mileage (10 miles); and Common Transport Multiplexing.

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Issue Date:  
August 20, 2009

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Effective Date:  
October 1, 2009

ACCESS SERVICE  
RATES AND CHARGES

8. Rates and Charges (Cont'd)

8.2 Switched Access Service (Cont'd)

8.2.8 Toll Free 8YY Transit Traffic Service

Direct Connect #  
Per Access Minute

\$0.003741

Indirect Connect ##  
Per Access Minute

\$0.007481

(N)

(N)

# Toll Free 8YY Transit Traffic -Direct Connect is comprised of the following rate elements: Tandem Switched Transmission, which includes one-half Tandem Transport Termination (fixed) and Tandem Transport Mileage (1 mile); Tandem Switching; and one-half Common Transport Multiplexing.

(N)

## Toll Free 8YY Transit Traffic -Indirect Connect is comprised of Tandem Switched Transmission, which includes Tandem Transport Termination (fixed) and Tandem Transport Mileage (10 miles); Tandem Switching; and Common Transport Multiplexing. These rates also apply in the event of an overflow situation with Toll Free 8YY Transit Traffic Service Direct Connect.

(N)

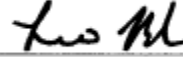
Issue Date:  
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Effective Date:  
October 1, 2009

## **CERTIFICATE OF SERVICE**

Copies of this document were served on the following parties by e-mail on September 11, 2009.



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