

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

Duke Manufacturing Co.,)	
Complainant,)	
)	
v.)	Case No. TC-2008-0191
)	
McLeodUSA Telecommunications)	
Services, Inc.)	

ANSWER TO COMPLAINT

McLeodUSA Telecommunications Services, Inc. ("McLeodUSA") files its Answer to the Complaint filed by Duke Manufacturing Co. ("Duke"). In support of its Answer, McLeodUSA states:

1. The allegations in Paragraph 1 are admitted.
2. The allegations in Paragraph 2 are admitted.
3. The allegations in Paragraph 3 are admitted.
4. The allegations in Paragraph 4 are admitted.
5. The allegations in Paragraph 5 are admitted.
6. The allegations in Paragraph 6 are admitted.
7. The allegations of Paragraph 7 are admitted.
8. The allegations of Paragraph 8 are denied. While Duke has experienced more trouble tickets than McLeodUSA would like, McLeodUSA has not violated the standards of adequate, just and reasonable service.
9. The allegation that Customer contacted McLeodUSA before filing the complaint is admitted. The allegation that there is no indication that service problems will be remedied is denied. McLeodUSA has informed Duke that the source of the majority of the service issues relate to the condition of several access loops provided by AT&T Missouri that are leased as unbundled network elements. Duke has also been advised that multiple requests have been made by McLeodUSA to AT&T Missouri to replace those circuits, but to date, AT&T Missouri has not replaced any circuits. In light of the access loop issue, McLeodUSA has offered to

release Duke from its obligation to take service at those locations served by those circuits, which offer was made before Duke filed its complaint. The Master Service Agreement between Duke and McLeodUSA provides that Duke's sole remedy when there are chronic service outages is to terminate service at the affected locations. Accordingly, Duke's complaint seeks a remedy beyond that which Duke had contractually agreed to.

10. The allegations of paragraph 10 are denied for lack of knowledge.
11. All correspondence, pleadings, orders, decisions and communications regarding this proceeding should be sent to undersigned counsel and to William Haas, Vice-President and Deputy General Counsel, at One Marthas Way, Hiawatha, Iowa 52233. email to bill.haas@mcleodusa.com.

WHEREFORE, McLeodUSA respectfully submits this Answer to Complaint and requests the Missouri Public Service Commission to deny Duke's Complaint.

Respectfully submitted,

/s/Mary Ann Young

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**Counsel for McLeodUSA
Telecommunication Service, Inc.**

Dated: January 14, 2008

Certificate of Service

I hereby certify a copy of this pleading has been transmitted electronically to the General Counsel of the Missouri Public Service Commission (gencounsel@psc.mo.gov), the Office of the Public Counsel (opcservice@ded.mo.gov), and counsel of record for Complainant (dmvuylsteke@bryancave.com) this 14th day of January 2008.

/s/Mary Ann Young

Mary Ann (Garr) Young