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September 17, 2001

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FILED

SEP 18 2001

Mr. Dale Hardy Roberts
Secretary/Chief Administrative Law Judge
Missouri Public Service Commission
P. O. Box 360
Jefferson City, MO 65102

Re: Case No. TO-2001-467

**Missouri Public
Service Commission**

Dear Judge Roberts:

Enclosed for filing please find an original and eight (8) copies of the MITG's Statement of Position on the issues contained in the Issues List.

I also separately file a request to be excused from the hearing.

Thank you for seeing these matters of record. Copies have been served upon all attorneys of record.

Sincerely,

Lisa Chase

Lisa Cole Chase

LCC:tr

Enc.

cc: MITG Managers
Dan Joyce, PSC General Counsel
Office of Public Counsel
All Attorneys of Record

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BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI

FILED

SEP 18 2001

In the Matter of the Investigation of the)
State of Competition in the Exchanges of)
Southwestern Bell Telephone Company)

Case No. TO-2001-467
Missouri Public
Service Commission
2001-467

MITG'S STATEMENT OF POSITIONS
ON THE PROPOSED LIST OF ISSUES

Comes now the MITG pursuant to the Commission's April 30, 2001 Order Adopting
Procedural Schedule herein and submits the following statements of position on the issues:

Issue 1. In which Southwestern Bell Telephone Company exchanges, if any, should
Southwestern Bell's core business switched services be classified as competitive
pursuant to Section 392.245.5 RSMo. 2000?

Position: MITG takes no position on this issue at this time.

Issue 2. In which Southwestern Bell Telephone Company exchanges, if any, should
Southwestern Bell's business line related services be classified as competitive
pursuant to Section 392.245.5 RSMo. 2000?

Position: MITG takes no position on this issue at this time.

Issue 3. In which Southwestern Bell Telephone Company exchanges, if any, should
Southwestern Bell's high capacity exchange access line services be classified as
competitive pursuant to Section 392.245.5 RSMo. 2000?

Position: MITG takes no position on this issue at this time.

Issue 4. In which Southwestern Bell Telephone Company exchanges, if any, should
Southwestern Bell's Plexar services be classified as competitive pursuant to
Section 392.245.5 RSMo. 2000?

Position: MITG takes no position on this issue at this time.

Issue 5. In which Southwestern Bell Telephone Company exchanges, if any, should Southwestern Bell's intraLATA private line/dedicated services be classified as competitive pursuant to Section 392.245.5 RSMo. 2000?

Position: MITG takes no position on this issue at this time.

Issue 6. In which Southwestern Bell Telephone Company exchanges, if any, should Southwestern Bell's residential access line services be classified as competitive pursuant to Section 392.245.5 RSMo. 2000?

Position: MITG takes no position on this issue at this time.

Issue 7. In which Southwestern Bell Telephone Company exchanges, if any, should Southwestern Bell's residential access line related services be classified as competitive pursuant to Section 392.245.5 RSMo. 2000?

Position: MITG takes no position on this issue at this time.

Issue 8. In which Southwestern Bell Telephone Company exchanges, if any, should Southwestern Bell's intraLATA toll services be classified as competitive pursuant to Section 392.245.5 RSMo. 2000?

Position: MITG takes no position on this issue at this time.

Issue 9. In which Southwestern Bell Telephone Company exchanges, if any, should Southwestern Bell's Local Plus services be classified as competitive pursuant to Section 392.245.5 RSMo. 2000?

Position: **SWBT's Local Plus Service should not be classified as competitive in any exchange until and unless there is a final resolution of the issues contained in SWBT's appeal of the Commission's Order in TO-2000-67. That docket concerned SWBT's compliance with the Commission's earlier requirement that SWBT make LP and its local dialing pattern functionality fully available for resale to CLECs and IXC's, at a uniform discount in order to assure that SWBT's Local Plus service is not anti-competitive. In any event Local Plus should only be classified as a competitive intraLATA toll service in exchanges where there is effective intraLATA toll competition in terms of a LATA-wide, flat rated intraLATA toll service dialed on a non-1+ dialing pattern functionality.**

Issue 10. In which Southwestern Bell Telephone Company exchanges, if any, should Southwestern Bell's Optional Metropolitan Calling Area (MCA) services be classified as competitive pursuant to Section 392.245.5 RSMo. 2000?

Position: MCA Service should not be classified as competitive pending resolution of current tariff proceeding TT-2002-108, in the matter of SWBT's Business MCA Promotion, in which concerns about the competitive aspects of discounts to SWBT business MCA customers were expressed by the Commission.

Issue 11. In which Southwestern Bell Telephone Company exchanges, if any, should Southwestern Bell's Wide Area Telecommunications Services (WATS) and 800 services be classified as competitive pursuant to Section 392.245.5 RSMo. 2000?

Position: MITG takes no position on this issue at this time.

Issue 12. In which Southwestern Bell Telephone Company exchanges, if any, should Southwestern Bell's special access services be classified as competitive pursuant to Section 392.245.5 RSMo. 2000?

Position: MITG takes no position on this issue at this time.

Issue 13. In which Southwestern Bell Telephone Company exchanges, if any, should Southwestern Bell's switched access services be classified as competitive pursuant to Section 392.245.5 RSMo. 2000?

Position: SWBT's switched access service should not be classified as competitive in any SWBT exchange until and if the Commission determines that effective facilities based local competition, hence switched access competition, exists in terms of both the number of local competitors and the market share that competitors have in comparison to SWBT in that exchange.

Issue 14. In which Southwestern Bell Telephone Company exchanges, if any, should Southwestern Bell's Common Channel Signaling/Signaling System 7 (SS7) services be classified as competitive pursuant to Section 392.245.5 RSMo. 2000?

Position: MITG takes no position on this issue at this time.

Issue 15. In which Southwestern Bell Telephone Company exchanges, if any, should Southwestern Bell's Line Information Database (LIDB) services be classified as competitive pursuant to Section 392.245.5 RSMo. 2000?

Position: MITG takes no position on this issue at this time.

Issue 16. In which Southwestern Bell Telephone Company exchanges, if any, should Southwestern Bell's directory assistance (DA) services be classified as competitive pursuant to Section 392.245.5 RSMo. 2000?

Position: MITG takes no position on this issue at this time.

Issue 17. In which Southwestern Bell Telephone Company exchanges, if any, should Southwestern Bell's operator services (OS) be classified as competitive pursuant to Section 392.245.5 RSMo. 2000?

Position: MITG takes no position on this issue at this time.

Issue 18. In each exchange served by SWBT, which if any alternative local exchange telecommunications company has been certified under Section 392.455 and has provided basic local telecommunications service in that exchange for at least five years (or if none, what is the longest period of time that a certified alternative local exchange company has provided basic local telecommunications service in that exchange)?

Position: MITG takes no position on this issue at this time.

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Certificate of Service

The undersigned does hereby certify that a true and accurate copy of the foregoing was mailed, via U.S. Mail, postage prepaid, this 18 day of September, 2001, to:

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P.O. Box 40
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Hubbard, OR 97032

2nd Century Communications, Inc.
7702 Woodland Center Blvd.
Suite 50
Tampa, FL 33614

AccuTel of Texas, Inc.
7900 John W. Carpenter Freeway
Dallas, TX 75247

Adelphia Business Solutions Operations, Inc.
121 Champion Way
Canonsburg, PA 15317

Allegiance Telecom of Missouri
1950 Stemmons Freeway
Suite 3026
Dallas, TX 75207-3118
American Communications Services
of Kansas City, Inc.
131 National Business Pkwy, #100
Annapolis Junction, MD 20701

ALLTELL Communications, Inc.
One Allied Drive
P.O. Box 2177
Little Rock, AR 72203
AT&T Communications of the
Southwest, Inc.
101 West McCarty, Suite 216
Jefferson City, MO 65101

BarTel Communications, Inc.
5223 Delmar Boulevard
St. Louis, MO 63108

Birch Telecom of Missouri, Inc.
2020 Baltimore Avenue
Kansas City, MO 64108

Brooks Fiber Communications of
Missouri, Inc.
701 Brazos, Suite 600
Austin, TX 78701

BTI (Business Telecom, Inc.)
4300 Six Forks Road, Suite 500
Raleigh, NC 27609

Buy-Tel Communications, Inc.
6409 Colleyville Blvd.
Colleyville, TX 76034

Camarato Distributing, Inc.
900 Camarato Drive
Herrin, IL 62948

Central Missouri Telecommunications, Inc.
P.O. Box 596
Osage Beach, MO 65065

Ciere Network Systems, Inc.
2630 Fountainview, Suite 300
Houston, TX 77057

Computer Business Sciences, Inc.
80-02 Kew Gardens Road, #5000
Kew Gardens, NY 11415

The Cube
Tin Can Communications Co. LLC
1063 Wirt Road, Suite 202
Houston, TX 77005

Delta Phones, Inc.

DMJ Communications, Inc.

P.O. Box 784
245 Illinois Street
Delhi, LA 71232

DPi-Teleconnect, L.L.C.
2997 LBJ Freeway, Suite 225
Dallas, TX 75234

Gabriel Communications of Missouri, Inc.
16090 Swingley Ridge Road
Chesterfield, MO 63017

Global Crossing Telemanagement, Inc.
1221 Nicollet Mall, Suite 300
Minneapolis, MN 55403

Intermedia Communications, Inc.
3625 Queen Palm Drive
Tampa, FL 33619

KMC Telecom III, Inc.
3075 Breckinridge Blvd., Suite 415
Duluth, GA 30096

Level 3 Communications, LLC
1450 Infinite Drive
Louisville, CO 80027

Maxcom, Inc.
10647 Widmer Road
Lenexa, KS 66215

MCImetro Access Transmission
Services, LLC
701 Brazos, Suite 600
Austin, TX 78701

McLeodUSA Telecommunications
Services, Inc.
P.O. Box 3177
Cedar Rapids, IA 52406

Missouri Telecom, Inc.

2525 North Grandview, Suite 900
Odessa, TX 79761

EZ Talk Communications, L.L.C.
4727 South Main
Stafford, TX 74777

Globel Crossing Local Services, Inc.
1221 Nicollet Mall, Suite 300
Minneapolis, MN 55403

HJN Telecom, Inc.
3235 Satellite Blvd., Building 400
Suite 300
Duluth, GA 30096

Ionex Communications, Inc.
5710 LBJ Freeway, Suite 215
Dallas, TX 75240

LDD, Inc.
24 South Minnesota
Cape Girardeau, MO 63702

Logix Communications Corporation
3555 NW 58th, Suite 900
Oklahoma City, OK 73112

Max-Tel Communications, Inc.
P.O. Box 280
102 W. Franklin
Alvord, TX 76225

MCI Worldcom Communications, Inc.
701 Brazos, Suite 600
Austin, TX 78701

Missouri Comm South, Inc.
P.O. Box 821269
6830 Walling Lane
Dallas, TX 75382-1269

Mpower Communications Corp.

P.O. Box 419
515 Cleveland, Suite C
Monett, MO 65708

Navigator Telecommunications, LLC
P.O. Box 8004
Little Rock, AR 72203

NOW Communications, Inc.
713 Country Place Drive
Jackson, MS 39208

The Pager Company
3030 East Truman Road
Kansas City, MO 64127

Phones for All
14681 Midway Road, Suite 105
Dallas, TX 75244

QCC, Inc.
8829 Bond Street
Overland Park, KS 66214

Quintelco, Inc.
1 Blue Hill Plaza
Pearl River, NY 10965

Ren-Tel Communications, Inc.
7337 S. Mitchell Ct.
Villa Rica, GA 30180

Smoke Signal Communications
8400 South Gessner
Houston, TX 77074

SouthWest TeleConnect
7000 Cameron Road, Suite 200
Austin, TX 78752-2828

Suretel, Inc.
5 North McCormick

175 Sully's Trail, Suite 202
Pittsford, NY 14534

Net-Tel Communications Corp.
1023 31st Street, NW
Washington, DC 20007

Omniplex Communications Group, LLC
17 Research Park Drive
St. Charles, MO 63304

Payroll Advance
808 South Baker
Mountain Home, AR 72643

Primary Network Communications
11432 Lackland Road
St. Louis, MO 63146

Quick-Tel Communications, Inc.
P.O. Box 196
456 W. Rock Island
Boyd, TX 76023

Qwest Communications Corporation
4250 N. Fairfax Drive, 12W002
Arlington, VA 22203

Simply Local Services, Inc.
2225 Apollo Drive
Fenton, MO 63026

Snappy Phone
P.O. Box 29620
6901 West 70th Street
Shreveport, LA 71129

Sprint Communications Company, LP
5454 West 110th Street
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TCG Kansas City, Inc.
Teleport Communications Group

Oklahoma City, OK 73127

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Teligent, Inc.
8065 Leesburg Pike, Suite 400
Vienna, VA 22182

TranStar Communications
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