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September 17, 2001

LANEITE R. GOOCH SHAWN BATTAGLER ROB TROBRIDGE JOSEPH M. PAGE LISA C. CHASE DEIDRE D. JEWEL OF COUNSEL: MARVIN L. SHARP PATRICK A. BAUMHOER GREGORY C. STOCKARD (1904-1993)

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

SEP 1 8 2001

Missouri Public Servise Commission

Re: Case No. TO-2001-467

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 Cole Chase

LCC:tr

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

TRENTON OFFICE 9th AND WASHINGTON P.O. BOX 547 TREN SPRINGFIELD OFFICE 1111 S. GLENSTONE P.O. BOX 4929 I 65808-4929

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PRINCETON OFFICE 207 NORTH WASHINGTON PRINCETON, MISSOURI 64673 660-748-2244 FAX 660-748-4405 SMITHVILLE OFFICE 119 E. MAIN STREET P.O. BOX 654 SMITHVILLE, MISSOURI 64089 816-532-3895 FAX 816-532-3899

FAX 660-359-2116

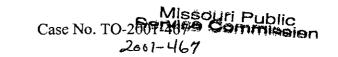
BEFORE THE PUBLIC SERVICE COMMISSION OF THE STATE OF MISSOURI

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



FILED

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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.



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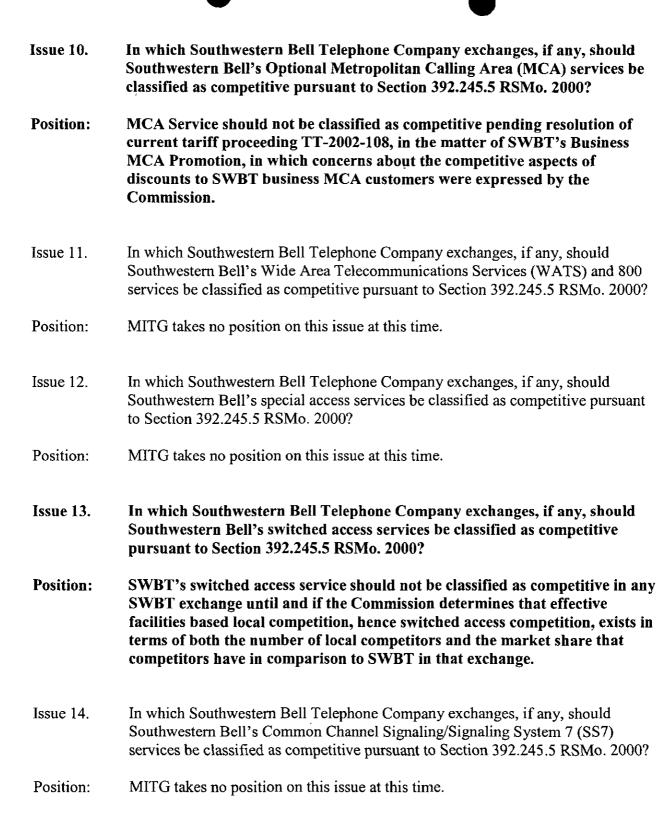
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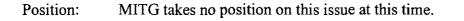
Issue 5.	In which Southwestern Bell Telephone Company exchanges, if any, should Southwestern Bell's intraLATA private line/dedicated services be classified as competitive pursuant to Section 392.245.5 RSMo. 2000?
Position:	MITG takes no position on this issue at this time.
Issue 6.	In which Southwestern 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 IXCs, 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.

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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?



- 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.

ANDERECK, EVANS, MILNE PEACE & JOHNSON

By:

Čraig S. Johnson, MoBar #28179 Lisa Cole Chase, MoBar # 51502 Marmaduke House 700 East Capitol Avenue P.O. Box 1438 Jefferson City, MO 65102 Telephone: 573/634/3422 Facsimile: 573/634/7822

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 😰 day of September, 2001, to:

1-800-Reconex, Inc. P.O. Box 40 2500 Industrial Avenue Hubbard, OR 97032

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

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

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

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

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

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

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

Delta Phones, Inc.

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

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

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

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

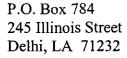
BTI (Business Telecom, Inc.) 4300 Six Forks Road, Suite 500 Raleigh, NC 27609

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

2630 Fountainview, Suite 300 Houston, TX 77057

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

DMJ Communications, Inc.



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 Overland Park, KS 66211

TCG Kansas City, Inc. Teleport Communications Group Oklahoma City, OK 73127

TCG St. Louis Two Teleport Drive, Suite 300 Staten Island, NY 10311

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

TranStar Communications P.O. Box 211807 Bedford, TX 76095

U.S. Telco, Inc. P.O. Box 606 Wilsonville, OR 97070

WorkNet Communications, Inc. 7777 Bonhomme Ave., Suite 2000 St. Louis, MO 63105 Two Teleport Drive Staten Island, NY 10311

Tel Com Plus U.S. Telecommunications, Inc. 5251 110th Avenue North, Suite 118 Clearwater, FL 33760-4837

Tel-Link, L.L.C. 1001 Third Ave. West, Suite 354 Bradenton, FL 34205

Universal Telephone 2405 E. Pawnee, Suite 10 Wichita, KS 67211-5455

Winstar Wireless, Inc. 1615 L Street, NW, Suite 1260 Washington, DC 20036

XO Missouri, Inc. (f/k/a Nextlink Missouri, Inc.) 2020 Westport Center Drive Maryland Heights, MO 63146

Lisa Cole Chase