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March 31, 2004

Hon. Dale Hardy Roberts Secretary, Missouri Public Service Commission P. O. Box 360 Jefferson City, MO 65102

RE: Case No. TX-2003-0379

Dear Judge Roberts:

Thank you for the opportunity to submit comments regarding proposed rules in Chapter 33 as published in the March 1 and March 15, 2004 editions of the *Missouri Register*. MCI's comments regarding the recommended changes are as follows:

## 4 CSR 240-3.545

MCI sees the potential for significant practical problems under subsection (12), in that a tariff filing could contain any number of rates and it would be impractical to list all the rates in a cover letter (and not possible with a 100-word limit). If the Commission is intent on highlighting all rate changes, then perhaps a separate price change document should be allowed as part of a filing.

Additionally, MCI notes that the cross-reference in subsection (15) appears to be in error, as there is a proposal to renumber that section to 33.040(4).

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Please feel free to contact me should you have any questions regarding this matter.

Very truly yours

/s/ Carl J. Lumley

Carl J. Lumley

cc. Office of Public Counsel General Counsel