# BEFORE THE PUBLIC SERVICE COMMISSION OF THE STATE OF MISSOURI

In the Matter of the Investigation of the	)	
State of Competition in the Exchanges of Sprint Missouri Inc.	)	Case No. IO-2003-0281

# POSITION STATEMENT OF SBC MISSOURI

COMES NOW Southwestern Bell Telephone, L.P., d/b/a SBC Missouri (SBC Missouri), and for its Position Statement on the Proposed List of Issues submitted by the parties to the Missouri Public Service Commission (Commission) on June 27, 2003, states as follows:

#### Issue 1:

Section 392.245.5 RSMo allows the Commission to classify services of a Price Cap Company as competitive. Sprint Missouri, Inc., a Price Cap Company, has requested that its residence core access line services (i.e., local exchange service, local operating service, directory listing, extension service, extended area service, local measured service and PBX service) offered in the Kearney, Norborne, Rolla, Platte City and St. Robert exchanges be classified as competitive. In which of these Sprint Missouri, Inc. exchanges, if any, should Sprint's residence core access line services be classified as competitive?

**SBC Missouri Position:** The Commission should classify the residence core access line services identified above as competitive in Sprint's Kearney, Norborne, Rolla, Platte City and St. Robert exchanges.

# <u>Issue 2</u>:

Section 392.245.5 RSMo allows the Commission to classify services of a Price Cap Company as competitive. Sprint Missouri, Inc., a Price Cap Company, has requested that its residence access line-related services (i.e., Sprint Solutions, busy line verification service, customer calling services, express touch, network service packages) offered in the Kearney, Norborne, Rolla, Platte City and St. Robert exchanges be classified as competitive. In which of these Sprint Missouri, Inc. exchanges, if any, should Sprint's residence access line-related services be classified as competitive?

**SBC Missouri Position:** The Commission should classify Sprint's residence access line-related services identified above as competitive in Sprint's Kearney, Norborne, Rolla, Platte City and St. Robert exchanges.

#### Issue 3:

Section 392.245.5 RSMo allows the Commission to classify services of a Price Cap Company as competitive. Sprint Missouri, Inc., a Price Cap Company, has requested that its business core access line services (i.e., local exchange service, local operating service, directory listing, extension service, extended area service, local measured service and PBX service) offered in the Kearney, Norborne, Rolla, Platte City and St. Robert exchanges be classified as competitive. In which of these Sprint Missouri, Inc. exchanges, if any, should Sprint's business core access line services be classified as competitive?

**SBC Missouri Position**: The Commission should classify the business core access line services identified above as competitive in Sprint's Kearney, Norborne, Rolla, Platte City and St. Robert exchanges.

#### Issue 4:

Section 392.245.5 RSMo allows the Commission to classify services of a Price Cap Company as competitive. Sprint Missouri, Inc., a Price Cap Company, has requested that its business access line-related services (i.e. Sprint Solutions, busy line verification service, customer calling services, express touch, network service packages) offered in the Kearney, Norborne, Rolla, Platte City and St. Robert exchanges be classified as competitive. In which of these Sprint Missouri, Inc. exchanges, if any, should Sprint's business access line-related services be classified as competitive?

**SBC Missouri Position**: The Commission should classify the business access line-related services identified above as competitive in Sprint's Kearney, Norborne, Rolla, Platte City and St. Robert exchanges.

#### Issue 5:

Section 392.245.5 RSMo allows the Commission to classify services of a Price Cap Company as competitive. Sprint Missouri, Inc., a Price Cap Company, has requested that its high capacity exchange access line services be classified as competitive. In which Sprint Missouri, Inc. exchanges, if any, should Sprint's high capacity exchange access line services be classified as competitive?

**SBC Missouri Position**: SBC Missouri takes no position on this issue at this time.

# Issue 6:

Section 392.245.5 RSMo allows the Commission to classify services of a Price Cap Company as competitive. Sprint Missouri, Inc., a Price Cap Company, has requested that its CENTREX services be classified as competitive. In which Sprint Missouri, Inc. exchanges, if any, should Sprint's CENTREX services be classified as competitive?

**SBC Missouri Position**: The Commission should classify Sprint's CENTREX services as competitive in all of Sprint's Missouri exchanges.

# Issue 7:

Section 392.245.5 RSMo allows the Commission to classify services of a Price Cap Company as competitive. Sprint Missouri, Inc., a Price Cap Company, has requested that its intraLATA private line services be classified as competitive. In which Sprint Missouri, Inc. exchanges, if any, should Sprint's intraLATA private line services be classified as competitive?

**SBC Missouri Position**: The Commission should classify Sprint's intraLATA private line services as competitive in all of Sprint's Missouri exchanges.

# Issue 8:

Section 392.245.5 RSMo allows the Commission to classify services of a Price Cap Company as competitive. Sprint Missouri, Inc., a Price Cap Company, has requested that its ATM and Frame Relay services be classified as competitive. In which Sprint Missouri, Inc. exchanges, if any, should Sprint's ATM and Frame Relay services be classified as competitive?

**SBC Missouri Position**: The Commission should classify Sprint's ATM and Frame Relay services as competitive in all of Sprint's Missouri exchanges.

#### Issue 9:

Section 392.245.5 RSMo allows the Commission to classify services of Price Cap Company as competitive. Sprint Missouri, Inc., a Price Cap Company, has requested that its special access services be classified as competitive. In which Sprint Missouri, Inc. exchanges, if any, should Sprint's special access services be classified as competitive?

**SBC Missouri Position**: SBC Missouri takes no position on this issue at this time.

# <u>Issue 10</u>:

Section 392.245.5 RSMo allows the Commission to classify services of a Price Cap Company as competitive. Sprint Missouri, Inc., a Price Cap Company, has requested that its intraLATA MTS services be classified as competitive. In which Sprint Missouri, Inc. exchanges, if any, should Sprint's intraLATA MTS services be classified as competitive?

**SBC Missouri Position**: The Commission should classify Sprint's intraLATA MTS services as competitive in all of Sprint's Missouri exchanges.

# Issue 11:

Section 392.245.5 RSMo allows the Commission to classify services of a Price Cap Company as competitive. Sprint Missouri, Inc., a Price Cap Company, has requested that its intraLATA WATS services and 800 services be classified as competitive. In which Sprint Missouri, Inc. exchanges, if any, should Sprint's intraLATA WATS services and 800 services be classified as competitive?

**SBC Missouri Position**: The Commission should classify Sprint's intraLATA WATS services and 800 services as competitive in all of Sprint's Missouri exchanges.

#### Issue 12:

Section 392.245.5 RSMo allows the Commission to classify services of a Price Cap Company as competitive. Sprint Missouri, Inc., a Price Cap Company, has requested that its Line Information Data Base Access (LIDB) services be classified as competitive. In which Sprint Missouri, Inc. exchanges, if any, should Sprint's LIDB services be classified as competitive?

**SBC Missouri Position**: The Commission should classify Sprint's LIDB services as competitive in all of Sprint's Missouri exchanges.

# <u>Issue 13</u>:

Section 392.245.5 RSMo allows the Commission to classify services of a Price Cap Company as competitive. Sprint Missouri, Inc., a Price Cap Company, has requested that its Speed Dial services be classified as competitive. In which Sprint Missouri, Inc. exchanges, if any, should Sprint's Speed Dial services be classified as competitive?

**SBC Missouri Position**: The Commission should classify Sprint's Speed Dial services as competitive in all of Sprint's Missouri exchanges.

# **Issue 14:**

Section 392.245.5 RSMo allows the Commission to classify services of a Price Cap Company as competitive. Sprint Missouri, Inc., a Price Cap Company, has requested that its Payphone services offered in the Kearney, Norborne, Rolla, Platte City and St. Robert exchanges be classified as competitive. In which of these Sprint Missouri, Inc. exchanges, if any, should Sprint's Payphone services be classified as competitive?

**SBC Missouri Position**: The Commission should classify Sprint's Payphone services as competitive in Sprint's Kearney, Norborne, Rolla, Platte City and St. Robert exchanges.

# <u>Issue 15</u>:

Section 392.245.5 RSMo allows the Commission to classify services of a Price Cap Company as competitive. Sprint Missouri, Inc., a Price Cap Company, has requested that its Directory Assistance services be classified as competitive. In which Sprint Missouri, Inc. exchanges, if any, should Sprint's Directory Assistance services be classified as competitive?

**SBC Missouri Position**: The Commission should classify Sprint's Directory Assistance services as competitive in all of Sprint's Missouri exchanges.

#### **Issue 16:**

Section 392.245.5 RSMo allows the Commission to classify services of a Price Cap Company as competitive. Sprint Missouri, Inc., a Price Cap Company, has requested that its Local Operator services be classified as competitive. In which Sprint Missouri, Inc. exchanges, if any, should Sprint's Local Operator services be classified as competitive?

**SBC Missouri Position**: The Commission should classify Sprint's Local Operator services as competitive in all of Sprint's Missouri exchanges.

# <u>Issue 17</u>:

Section 392.245.5 RSMo allows the Commission to classify services of a Price Cap Company as competitive. Sprint Missouri, Inc., a Price Cap Company, has requested that its ISDN services offered in the Kearney, Norborne, Rolla, Platte City and St. Robert exchanges be classified as competitive. In which of these Sprint Missouri, Inc. exchanges, if any, should Sprint's ISDN services be classified as competitive?

**SBC Missouri Position**: The Commission should classify Sprint's ISDN services as competitive in Sprint's Kearney, Rolla, Platte City and St. Robert exchanges.

## **Issue 18:**

Section 392.245.5 RSMo allows the Commission to classify services of a Price Cap Company as competitive. Sprint Missouri, Inc., a Price Cap Company, has requested that its Optional MCA services offered in the Kearney exchange be classified as competitive. Should Sprint's Optional MCA services be classified as competitive in that Sprint Missouri, Inc. exchange?

**SBC Missouri Position**: The Commission should classify Sprint's Optional MCA services as competitive in Sprint's Kearney exchange.

#### Issue 19:

In absence of a request by Sprint Missouri, Inc. for the reclassification of a service in an exchange pursuant to Section 392.245.5, RSMo from price cap regulation to competitive status, should the Commission make a finding that effective competition does not exist and order that the current price cap regulation continue to apply?

**SBC Missouri Position**: SBC Missouri takes no position on this issue at this time.

# Issue 20:

Section 392.245.5, RSMo provides that the Commission shall investigate the state of competition in Sprint's exchanges within five years of an alternative local exchange telecommunications company first being ExOP of Missouri Inc.'s certification was effective on December 15, 1998. If the Commission does not issue a decision in this case by December 15, 2003, will any of Sprint Missouri Inc.'s telecommunications services in any Sprint Missouri, Inc. exchange be automatically reclassified or reclassified by default from price cap regulation to a competitive status?

**SBC Missouri Position**: SBC Missouri takes no position on this issue at this time.

Respectfully submitted,

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#### Certificate of Service

I hereby certify that copies of the foregoing have been mailed, hand-delivered, transmitted by facsimile or e-mailed to all counsel of record this 9th day of July, 2003.

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