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May 25, 2000

The Honorable Dale Hardy Roberts
Secretary/Chief Regulatory Law Judge
Missouri Public Service Commission
301 West High Street, Floor 5A
Jefferson City, Missouri 65101

FILED

MAY 25 2000

**Missouri Public
Service Commission**

Re: Case No. TC-2000-596

Dear Judge Roberts:

Enclosed for filing with the Commission in the above-referenced case is an original and eight copies of Southwestern Bell Telephone Company's Answer to Complainants Ray and Janet Heaton's Complaint.

Thank you for bringing this matter to the attention of the Commission.

Very truly yours,

Mimi B. MacDonald
by jmc

Mimi B. MacDonald

Enclosure

cc: Attorneys of Record

BEFORE THE PUBLIC SERVICE COMMISSION OF THE
STATE OF MISSOURI

FILED

MAY 25 2000

RAY AND JANET HEATON,

Complainants,

v.

SOUTHWESTERN BELL, AT&T,
AND CONNECT ONE INTERNET
SERVICE,

Respondents.

Missouri Public
Service Commission

Case No. TC-2000-596

SOUTHWESTERN BELL TELEPHONE COMPANY'S
ANSWER TO COMPLAINANTS
RAY AND JANET HEATON'S COMPLAINT

Comes now Southwestern Bell Telephone Company ("SWBT") and, for its Answer to Complainants Ray and Janet Heaton's Complaint, states as follows:

1. On March 23, 2000, Complaints Ray and Janet Heaton ("Complainants"), filed a Complaint against SWBT, AT&T Communications of the Southwest, Inc. ("AT&T"), and Connect One Internet Service ("Connect One").
2. SWBT admits that Complainants reside at 1317 Lexington, Mexico, Missouri 65265.
3. SWBT admits that both it and AT&T are public utilities under the jurisdiction of the Public Service Commission ("Commission") of the State of Missouri. SWBT denies that Connect One is a public utility under the jurisdiction of the Commission of the State of Missouri, and, therefore, denies the remaining allegations in paragraph 1 of Complainants' Complaint.

4. SWBT is without sufficient knowledge or information to form a belief as to the truth or veracity of the allegations in paragraph 2 of the Complainants' Complaint and, therefore, denies any and all allegations in paragraph 2 of Complainants' Complaint.

5. SWBT admits that on February 8, 2000, Mrs. Heaton called SWBT and SWBT referred Mrs. Heaton to AT&T. SWBT is without sufficient knowledge or information to form a belief as to the truth or veracity of the remaining allegations in paragraph 3 of Complainants' Complaint, and, therefore, denies any and all of the remaining allegations in paragraph 3 of Complainants' Complaint.

6. For further answer and affirmative defense, SWBT states that it did not provide intraLATA toll service to Complainants.

7. For further answer and affirmative defense, SWBT states that it neither billed Complainants for their AT&T charges nor charged them for local long distance as alleged in their Complaint. As reflected in bills which are attached to Complainants' Complaint, the bills at issue were sent by AT&T, not SWBT.

8. For further answer and affirmative defense, SWBT states that Complainants have not asserted that SWBT violated any statute, tariff or order of the Commission.

9. For further answer and affirmative defense, SWBT states that in order to ensure customer satisfaction and in response to a PSC Complaint Group inquiry, on or about April 19, 2000, SWBT advised Mrs. Heaton that it issued an adjustment to her account in the amount of \$591.81 and that when it posted to her SWBT bill, SWBT would send her a refund check that she could apply to her AT&T bill. Mrs. Heaton thanked SWBT and indicated that she was very satisfied with SWBT. On May 16, 2000, SWBT mailed the refund check to the Heaton.

Wherefore, having fully answered Complainants' Complaint, Southwestern Bell Telephone Company prays that the Commission dismisses this action and grants such other relief as the Commission deems just and proper.

Respectfully submitted,

SOUTHWESTERN BELL TELEPHONE COMPANY

By Mimi B. MacDonald by gm
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CERTIFICATE OF SERVICE

I hereby certify that copies of this document were served on the following parties by first-class, postage prepaid U.S. Mail on May 25, 2000.

Mimi B. MacDonald
Mimi B. MacDonald *by Jm=*

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