

**BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI**

In the Matter of Neutral Tandem-Missouri,)
LLC's Filing to Introduce Its Access) Case No. TT-2010-0099
Services Tariff P.S.C. Mo.-No. 3.)

**AT&T'S RESPONSE TO
NEUTRAL TANDEM STATUS REPORT**

AT&T Communications and AT&T Missouri (collectively, the "AT&T Companies"),¹ respectfully confirm that most of the concerns the AT&T Companies expressed in its September 18, 2009, Motion to Suspend have been addressed by Neutral Tandem-Missouri, LLC ("Neutral Tandem"). Certain issues, however, remain that should be investigated by the Missouri Public Service Commission ("Commission") before Neutral Tandem's Access Services Tariff is allowed to become effective.

1. With its proposed tariff filing, Neutral Tandem seeks to insert alternative access tandem switches into the telecommunications network in Missouri. The AT&T Companies do not oppose the general concept of increasing the level of competitions in the telecommunications field. However, it is essential to ensure that such new entrants are required to comply with established industry standards.

The AT&T Companies recognize and appreciate Neutral Tandem's willingness to add language in the proposed tariff indicating its plan to follow the Ordering and Billing Forum's ("OBF's") Multiple Exchange Carrier Access Billing ("MECAB") Guidelines. Adherence to these guidelines is critical to ensure that industry standard billing records are created and exchanged between carriers. Such records enable all carriers participating in the delivery of a call to bill and receive appropriate intercompany compensation for the services they provide.

¹ AT&T Communications of the Southwest, Inc. will be referred to in this pleading as "AT&T Communications;" and Southwestern Bell Telephone Company, d/b/a AT&T Missouri, will be referred to in this pleading as "AT&T Missouri."

But as Neutral Tandem's proposed tariffs indicate an intention to aggregate the traffic of third party carriers, Neutral Tandem's tariff should also make clear that Neutral Tandem will require such carriers also to adhere to the MECAB requirements and to negotiate, prior to implementation, appropriate billing arrangements with the other carriers on the route. The tariff should also indicate that Neutral Tandem will not route to an incumbent local exchange carrier's ("ILEC's") tandem access service traffic that originated outside the LATA where the ILEC tandem resides. Lack of such an agreement with the third parties will likely result in inaccurate billing and allow such third parties to send traffic originating outside the LATA and/or state to AT&T Missouri, for hand-off to an IXC, which is in clear violation of AT&T's switched access tariff. A provision such as the following will address these concerns:

To the extent the Telephone Company jointly provides access services in conjunction with a third-party carrier that will bill interexchange Carrier Customers of that third-party carrier's switched access service, pursuant to that third-party carrier's tariff or other authority, for that third party carrier's portion of the total service, the Company and third-party carriers(s) will enter into a billing agreement with all billing carriers which is consistent with the provisions contained in MECAB. Access service calls routed to an Incumbent Local Exchange Carrier's (ILEC) Tandem Switching facility will conform to the LATA restrictions as defined both in said ILEC's switched access tariff and in MECAB.

Other carriers aggregating traffic have addressed the issue similarly in their tariffs.²

2. In principle, network traffic aggregation can reduce costs for carriers and should benefit end users. Here, however, Neutral Tandem's proposal appears to result in the imposition of additional costs on LECs to implement the new network architecture (to accommodate alternative access tandem switches into the network) and on IXCs to connect to multiple tandems to ensure their calls are completed. The AT&T Companies continue to believe that it is

² See e.g., MCImetro Access Transmission Services LLC d/b/a Verizon Access Transmission Services, Access Services Tariff, Missouri PSC Tariff No. 2, Section 5.2.3.1.4, Original Page No. 47.1, effective May 8, 2008. See also Sprint Communications Company LP Access Service Tariff, Missouri PSC Tariff No. 5, Section 2.4.7, 1st Revised Page 2-28, effective November 14, 2009.

inappropriate for all such costs to be shifted to ILECs and IXCs currently operating in the state when the only beneficiary of such network changes appear to flow to Neutral Tandem.

WHEREFORE the AT&T Companies respectfully request the Commission to suspend Neutral Tandem's proposed tariff filing for investigation.

Respectfully submitted,

AT&T COMMUNICATIONS OF THE SOUTHWEST
INC., and
SOUTHWESTERN BELL TELEPHONE COMPANY,
D/B/A AT&T MISSOURI

BY  _____

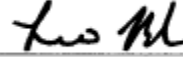
LEO J. BUB #34326

ROBERT J. GRYZMALA #32454

Attorneys for AT&T Missouri and AT&T Communications
One AT&T Center, Room 3518
St. Louis, Missouri 63101
314-235-2508 (Telephone)/314-247-0014(Facsimile)
leo.bub@att.com

CERTIFICATE OF SERVICE

Copies of this document were served on the following parties by e-mail on November 13, 2009.



Leo J. Bub

General Counsel
Missouri Public Service Commission
PO Box 360
Jefferson City, MO 65102
general.counsel@psc.mo.gov

Public Counsel
Office of the Public Counsel
PO Box 7800
Jefferson City, MO 65102
opcservice@ded.mo.gov

William Steinmeier
Mary Ann Young
P.O. Box 104595
2031 Tower Drive
Jefferson City, MO 65110-4595
wds@wdspsc.com
MYoung0654@aol.com