

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

In the Matter of a Request for the Modification)
Of the Kansas City Metropolitan Calling Area Plan) Case No. TO-2005-0144
To Make the Greenwood Exchange Part of the)
Mandatory MCA Tier 2)

**SOUTHWESTERN BELL TELEPHONE, L.P., D/B/A SBC MISSOURI'S
REPLY TO OFFICE OF PUBLIC COUNSEL'S RESPONSE TO SBC MISSOURI'S
MOTION TO DISMISS OFFICE OF THE PUBLIC COUNSEL'S REQUEST TO
MODIFY THE KANSAS CITY CALLING AREA PLAN TO INCLUDE THE
GREENWOOD EXCHANGE IN THE MANDATORY MCA TIER 2**

Comes now Southwestern Bell Telephone, L.P., d/b/a SBC Missouri ("SBC Missouri") and, for its Reply to Office of Public Counsel's ("OPC") Response to SBC Missouri's Motion to Dismiss OPC's Request to Modify the Kansas City Calling Area Plan to Include the Greenwood Exchange in the Mandatory MCA Tier 2 ("OPC's Request"), states as follows:

1. SBC Missouri reiterates that the Missouri Public Service Commission ("Commission") should dismiss OPC's Request. As OPC candidly admits, there are already two cases that are currently pending to address this issue.¹ Moreover, OPC offers no justification for having the same request for relief pending in two cases. It is, quite simply, not appropriate for the same issue to be considered in multiple, concurrent proceedings.

2. Additionally, while OPC states that its Request in this case is based on its view of the Task Force's report and recommended process², to date, the Commission has not considered the Task Force Recommendations, including the recommendation that previously filed petitions for proposed modifications to the MCA be taken up and considered as filed petitions under the process proposed by the Task Force. Thus, the Commission should first consider the Task Force Recommendations before considering OPC's Request.


¹ See OPC's Response to SBC Missouri's Motion to Dismiss Request for Expansion of the St. Louis MCA, page 1, paragraph 1.

² Id. at page 1, paragraph 2.

Wherefore, SBC Missouri prays that the Missouri Public Service Commission grants its Motion to Dismiss Request to Modify the Kansas City Calling Area Plan to Include the Greenwood Exchange in the Mandatory MCA Tier 2, together with any additional relief that the Commission deems just and proper.

Respectfully submitted,

SOUTHWESTERN BELL TELEPHONE, L.P.

By: 

PAUL G. LANE #27011

LEO J. BUB #34326

ROBERT J. GRYZMALA #32454

MIMI B. MACDONALD #37606

Attorneys for Southwestern Bell Telephone, L.P.

One SBC Center, Room 3510

St. Louis, Missouri 63101

314-235-4094 (Telephone)/314-247-0014 (Facsimile)

mimi.macdonald@sbccom (E-Mail)

CERTIFICATE OF SERVICE

Copies of this document were served on the following parties via e-mail on December 10, 2004.


Mimi B. MacDonald

Dana K Joyce
P.O. Box 360
200 Madison Street, Suite 800
Jefferson City, MO 65102

John B Coffman
P.O. Box 2230
200 Madison Street, Suite 650
Jefferson City, MO 65102

Michael F Dandino
Office of the Public Counsel
200 Madison Street, Suite 650
P O Box 2230
Jefferson City, MO 65102