

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

In the Matter of the Amendment	)	
Superseding Certain 251/252 Matters to	)	
Interconnection Matters Under Sections	)	
251 and 252 of the Telecommunications	)	TO-2005-0287
Act of 1996 between Sage Telecom, Inc.	)	
And Southwestern Bell Telephone, L.P.,	)	
d/b/a SBC Missouri	)	

**SOUTHWESTERN BELL TELEPHONE, L.P.,**  
**D/B/A SBC MISSOURI'S POSITION STATEMENT**

Comes now Southwestern Bell Telephone, L.P., d/b/a SBC Missouri ("SBC Missouri") and, for its Position Statement, states as follows:

(1) Is the Local Wholesale Complete Agreement between Sage Telecom, Inc. and SBC Missouri subject to review by the Missouri Public Service Commission?

No. The Local Wholesale Complete Agreement between Sage Telecom, Inc. and SBC Missouri does not address matters that are subject to Section 251 and, therefore, should not be reviewed by the Missouri Public Service Commission ("Commission") under Section 252.

(2) Should the Missouri Public Service Commission approve the amendment to the interconnection agreement between Sage Telecom, Inc. and SBC Missouri and/or the amendment to the interconnection agreement between Sage Telecom, Inc. and SBC Missouri with the local wholesale complete agreement as an attachment pursuant to Section 252(e)(2)(A)?

Yes. The Commission should approve the amendment to the interconnection agreement between Sage Telecom, Inc. and SBC Missouri pursuant to Section 252(e)(2)(A) because it does not discriminate against any telecommunications carrier that

is not a party to the agreement nor is it inconsistent with the public interest, convenience, and necessity. While SBC Missouri does not believe that the Commission should review the Local Wholesale Complete Agreement in that it does not address matters that are subject to Section 251, to the extent that the Commission for any reason determines that the Local Wholesale Complete Agreement or any part thereof is subject to approval subject to Section 252, the Commission should approve the amendment to the interconnection agreement between Sage Telecom, Inc. and SBC Missouri with the Local Wholesale Complete Agreement pursuant to Section 252(e)(2)(A) because these documents do not discriminate against any telecommunications carrier that is not a party nor are they inconsistent with the public interest, convenience, and necessity

Respectfully submitted,

**SOUTHWESTERN BELL TELEPHONE, L.P.**

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## **CERTIFICATE OF SERVICE**

Copies of this document were served on the following parties via e-mail on April 6, 2005.

  
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