



Stephen D. Minnis
Senior Attorney

Sprint Corporation
5454 West 110th Street
Overland Park, KS 66211
Voice 913 345 7918
Fax 913 345 7568
steve.minnis@mail.sprint.com

March 13, 2001

The Honorable Dale Hardy Roberts
Secretary/Chief Regulatory Law Judge
Missouri Public Service Commission
200 Madison Street, Suite 650
P O. Box 360
Jefferson City, Missouri 65101

FILED³
MAR 13 2001 *mh*
Missouri Public
Service Commission

Re: In the Matter of the Investigation Into Signaling Protocols, Call Records,
Trunking Arrangements, and Traffic Measurement
Case No. TO-99-593

Dear Judge Roberts:

Please accept for filing with the Commission an original and eight (8) copies of Sprint's Post-Hearing Reply Brief in the above-entitled matter.

If you have any questions or comments, please do not hesitate to call me at (913) 624-6425.

Sincerely,

Stephen D. Minnis
Stephen D. Minnis *by Denis Bergmeyer*

SDM:mkj

cc: All Parties of Record

STATE OF MISSOURI
PUBLIC SERVICE COMMISSION

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MAR 13 2001
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In the Matter of the Investigation into the)
Signaling Protocols, Call Records,)
Trunking Arrangements, and Traffic)
Measurement)

Case No. TO-99-593

SPRINT'S POST-HEARING REPLY BRIEF

Comes now Sprint-Missouri, Inc. and Sprint Communications Company, L.P. (collectively "Sprint") and hereby files it's post-hearing reply brief in the above captioned matter as follows:

The Small LECs continue to argue that the Commission should ignore prior orders; ignore other state's actions, and ignore evidence that suggests that the Small LECs' terminating records are not accurate.

The Small LECs are asking the Commission to bless a new business relationship between themselves and the former PTCs. Thus the Small LECs are requesting the Commission ignore the previous PTC order that set up this business relationship in the first place as well as to ignore the PTC order which specified the issues in this docket, none of which were a review of the business relationship between the Small LECs and the former PTCs. Although the Small LECs have chosen to disregard the precedents of the Commission, Sprint urges the Commission not to. The business relationship was formed by the Commission only a short time ago after a lengthy PTC docket. It is not time to do away with the time and effort put forth by the industry and the Commission. The prudent action is to not modify the business relationship and require the parties to continue to work together to resolve issues between them.

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This current relationship was set up only two years prior and, as with all new ventures, there are always some kinks to work out. This process has been beneficial in working out those issues. The records test located certain types of traffic that had not previously been recorded. The Process continues, however, and should not be turned upside down without an opportunity to work any remaining recording bugs out.

The Small LECs also do not want the Commission to be cautious in their actions compared to other states' actions. Instead, the Small LECs suggest that to adopt their proposal would be a badge of honor for Missouri as it would be the only known state that has gone the route of relying on terminating records for trunk to end-user termination. Witnesses testified that they were aware of no other state that had an arrangement similar to the one proposed here by the Small LECs. This is not a situation that demands uniqueness. No other state has found it to be beneficial to implement this type of plan and Missouri does not need to go out on a limb for the Small LECs.

Finally, the Small LECs want the Commission to avoid evidence that suggests the Small LECs' own terminating records are not a bastion of accuracy. The Small LECs expert witness acknowledged on the stand that there should be further review as to whether the Small LECs are recording calls that are not answered. Evidence presented by Verizon and Sprint suggest this is, in fact, what is happening. This tempers the strong accusations by the Small LECs and leaves one to wonder whether the Small LECs' records should be relied upon for this process. Sprint suggests that it is hard to tell whose records are accurate and, therefore, the status quo should be maintained and the parties required to work together to solve any issues still remaining.

Previous rulings by this Commission, other states' actions and the uncertainty of the accuracy of the Small LECs' terminating records should lead the Commission to question

whether uprooting the business relationship in place today is the correct action. With the placement of the AcceSS7 system and the Ordering and Billing Forum (OBF) Issue 2056 being implemented this year, it would seem more prudent not to modify the current business relationship at this time, but rather to maintain this process.

Although Sprint firmly believes that the current business relationship should be maintained, it has also proposed a compromise that would evenly split the recorded difference 50/50. This is in contrast to the 100/0 split proposed by the Small LECs. The Small LECs, of course, reject this proposal and instead suggest that if a compromise is used, it should be based on revenues. This suggestion, naturally, is not much different from a 100/0 split due to the difference in revenues between the former PTCs and the Small LECs.

The 50/50 split is an extremely reasonable compromise and one that should be looked at seriously by the Commission. Of course, the records must first be accurate and the 50/50 split should not take into account ring no answer calls.

The Commission is under no obligation to make changes to the business relationship between the Small LECs and former PTCs. It should maintain its earlier position taken in the PTC order. However, if the Commission does choose to modify the business relationship, then it should require the companies share the risks and incentives and employ a 50/50 split of the residual difference.

Respectfully submitted,

SPRINT MISSOURI, INC.
SPRINT COMMUNICATIONS COMPANY, L.P.

Stephen D. Minnis by Davis Bergmeyer
Stephen D. Minnis, Ks. Bar #12442

5454 W. 110th Street
Overland Park, KS 66211
Tele. (913) 624-6425
Fax: (913) 624-5504
steve.minnis@mail.sprint.com

Paul Gardner by Davis Bergmeyer
Paul Gardner, Mo. Bar # 28159

Goller, Gardner & Feather
131 High Street
Jefferson City, MO 65101
Tele. (573) 635-6181
Fax (573-635-1155
info@gollerlaw.com

CERTIFICATE OF SERVICE

I HEREBY certify that copies of the foregoing document were served on this 13
day of March, 2001 via U.S. Mail, first class postage prepaid, to each of the
following parties:

Mr. Dan Joyce
General Counsel
Missouri Public Service Commission
Governor Office Building
200 Madison Street, Suite 650
Jefferson City, Missouri 65102

Ms. Martha Hogerty
Office of the Public Counsel
P. O. Box 7800
Jefferson City, Missouri 65102

Mr. Michael Dandino
Office of the Public Counsel
Governor Office Building

200 Madison Street, Suite 650
Jefferson City, Missouri 65102

Mr. Paul S. DeFord
Lathrop & Gage
2345 Grand Blvd
Kansas City, Missouri 64108

Mr. W. R. England III
Brydon Swearengen & England
P.O. Box 456
Jefferson, City, Missouri 65102

Mr. Dave Evans
GTE Midwest Incorporated

601 Monroe St., Suite 304
Jefferson City, Missouri 65101

Mr. Jim Fischer
Fischer & Dority PC
101 Madison Street, Suite 400
Jefferson City, Missouri 65101-3015

Mr. Craig Johnson
Andereck, Evans, Milne, Pease
& Baumhoer
700 East Capitol Street
P. O. Box 1438
Jefferson City, Missouri 65102

Mr. Keith Krueger
Deputy General Counsel

Missouri Public Service Commission
Governor Office Building
200 Madison Street, Suite 650
Jefferson City, Missouri 65102

Mr. Paul Lane
Mr. Tony Conroy
Mr. Leo Bub
SWBT
One Bell Center, Room 3518
St. Louis, Missouri 63101

Rose Mulvaney
Birch Telecom
2020 Baltimore
Kansas City, Missouri 64104

Stephen D. Minnis

Stephen D. Minnis

by Don's Bergmeyer