

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

In the Matter of the Application of)
Southwestern Bell Telephone Company,)
d/b/a AT&T Missouri, for Registration) Case No. _____
to Provide Interconnected Voice over)
Internet Protocol Service.)

APPLICATION

COMES NOW Southwestern Bell Telephone Company, d/b/a AT&T Missouri, pursuant to §392.550 RSMo 2008 (Cum. Supp.), and for its application to the Missouri Public Service Commission (“Commission”) for registration to provide interconnected voice over Internet protocol service, states as follows:

1. The Applicant’s legal name is Southwestern Bell Telephone Company, d/b/a AT&T Missouri (“AT&T Missouri”). AT&T Missouri is a Missouri corporation with its principal Missouri office at One AT&T Center, Room 3520, St. Louis, Missouri 63101. AT&T Missouri is authorized to do business in Missouri¹ and its fictitious name is duly registered with the Missouri Secretary of State.² AT&T Missouri is a "local exchange telecommunications company" and a "public utility," and is duly authorized to provide "telecommunications service" within the State of Missouri, as each of those phrases is defined in Section 386.020, RSMo 2000.³

¹ In accordance with 4 CSR 240-2.060(1) and (G), a certified copy of Southwestern Bell Telephone Company’s Certificate of Good Standing from the Missouri Secretary of State was filed with the Commission on August 15, 2007, in Case No. IK-2008-0044.

² In accordance with 4 CSR 240-2.060(1)(E) and (G), a copy of the registration of the fictitious name “AT&T Missouri” was filed with the Commission on July 17, 2007, in Case No. TO-2002-185.

³ Following its June 26, 2007, Order in Case No. TO-2002-185 allowing Southwestern Bell Telephone, L.P., d/b/a AT&T Missouri, to alter its status from a Texas limited partnership to a Missouri corporation, the Commission approved tariff revisions to reflect the new corporate name, Southwestern Bell Telephone Company d/b/a AT&T Missouri. *See, Order Granting Expedited Treatment and Approving Tariffs*, Case No. TO-2002-185, issued June 29, 2007.

2. AT&T Missouri's counsel, street and mailing address, electronic mail address, fax and telephone number (to which all correspondence, pleadings, orders, decisions, and communications regarding this proceeding should be directed) are as follows:

Timothy P. Leahy
Leo J. Bub
Robert J. Gryzmala
Attorneys for Southwestern Bell Telephone Company
d/b/a AT&T Missouri
One AT&T Center, Room 3516
St. Louis, Missouri 63101
tn: 314-235-6060
fax: 314-247-0014
robert.gryzmala@att.com

3. AT&T Missouri seeks registration to offer and provide interconnected voice over Internet protocol service.

4. Attached is an affidavit signed by an officer of AT&T Missouri making the eight statements required by §392.550.3 RSMo, plus confirmation that AT&T Missouri's service meets the criteria of interconnected voice over Internet protocol service as defined by §386.020(23).

5. AT&T Missouri has no final unsatisfied judgments or decisions against it from any state or federal agency or court, which involve retail customer service or rates, which action, judgment or decision has occurred within three (3) years of the date of this Application. Moreover, AT&T Missouri has no pending actions which satisfy the listed criteria in Arkansas, Kansas, Missouri or Oklahoma. AT&T Missouri (which operates in Texas under the fictitious name AT&T Texas) has six pending formal complaints or


lawsuits from end-user customers in Texas which involve retail customer service or rates.⁴

6. AT&T Missouri does not have any annual report or assessment fees that are overdue in Missouri.

WHEREFORE, Southwestern Bell Telephone Company, d/b/a AT&T Missouri, requests that the Commission issue an order granting it a registration to offer and provide interconnected voice over Internet protocol service in the exchanges listed in the attached Affidavit.

Respectfully submitted,

SOUTHWESTERN BELL TELEPHONE COMPANY
D/B/A AT&T MISSOURI

BY 

TIMOTHY P. LEAHY #36197

LEO J. BUB #34326

ROBERT J. GRYZMALA #32454

Attorneys for AT&T Missouri
One AT&T Center, Room 3516
St. Louis, Missouri 63101
314-235-6060 (Telephone)/314-247-0014(Facsimile)
robert.gryzmala@att.com

⁴ The pending lawsuits in Texas involving customer service or rates are (1) Irving's Holding, Inc. v. SBC Communications, Inc., Docket No. CC-05-07415-C and (2) David Lavine, M.D. and David Lavine, M.D., P.A. d/b/a Center for Cosmetic and Reconstructive Surgery v. AT&T Inc., Cause No. 07-54771-2. The pending formal complaints before the Texas Public Utility Commission involving customer service or rates are as follows: (1) Complaint of Harris County Hospital District Against AT&T Texas, Docket No. 34332; (2) Complaint of Harris County Hospital District Against AT&T Texas, Docket No. 34940; (3) Complaint of Harris County Hospital District Against AT&T Texas, Docket No. 35363; Complaint of Lonzie Leath Against AT&T Texas, Docket No. 35133; and (4) Complaint of John J. Gitlin, Esq. Against AT&T Texas, Docket No. 34348.

AFFIDAVIT

STATE OF MISSOURI)
)
CITY OF ST. LOUIS) SS

I, David Nichols, a natural person, do hereby swear and affirm that I am an officer of Southwestern Bell Telephone Company, d/b/a AT&T Missouri (“AT&T Missouri”), and that the following statements are true and correct to the best of my knowledge, information and belief:

(1) The location of AT&T Missouri’s principal place of business is One AT&T Plaza, 208 S. Akard, Dallas, Texas 75202, and its principal executive officers are: Mark Keiffer, President and Chief Executive Officer; David Nichols, President-Missouri; Bryan Gonterman, President-Oklahoma; Edward Drilling, President-Arkansas; Don Cain, President-Texas; Dan Jacobsen, President-Kansas; Ernie Carey, Senior Vice President-Network Services; Xavier D. Williams, Senior Vice President-Business Communications Services; and April J. Rodewald, Senior Vice President;

(2) The following identifies each exchange, in whole or in part, of a local exchange company, in which AT&T Missouri proposes to provide interconnected voice over Internet protocol service: Antonia, Chesterfield, Eureka, Farley, Farmington, Fenton, Grain Valley, Greenwood, Harvester, Kansas City, Manchester, Maxville, Pond, Smithville, St. Charles, St. Louis, and Valley Park;

(3) AT&T Missouri is legally, financially, and technically qualified to provide interconnected voice over Internet protocol services;

(4) AT&T Missouri is ready, willing, able, and will comply with all applicable state and federal laws and regulations imposed upon providers of interconnected voice over Internet protocol services;

(5) AT&T Missouri will charge and collect from its end user customers on interconnected voice over Internet protocol service, and remit to the appropriate authority, fees and surcharges in the same manner as are charged and collected upon end user customers of local exchange telecommunications service and remitted by local exchange telecommunications companies, including but not necessarily limited to:

- (a) Telecommunications programs under section 209.255, RSMo;
- (b) Missouri universal service fund under section 392.248;
- (c) Local enhanced 911;
- (d) Any applicable license tax;

(6) AT&T Missouri will remit the annual assessment imposed by the Commission under section 386.370, RSMo;

(7) AT&T Missouri will file, either directly or indirectly through an affiliated competitive local exchange carrier, with the Commission an annual report at a time and covering the yearly period fixed by the Commission;

(8) AT&T Missouri has established a process for handling inquiries from customers concerning billing issues, service issues, and other consumer-related complaints. Consumer complaints may be directed to: Customer Appeals
1010 Pine St., Room 6-E-22, St. Louis MO 63101 (tn: 800-283-6407); and

(9) AT&T Missouri's interconnected voice over Internet protocol service meets the following criteria:

- (a) Enables real-time, two-way voice communications;
- (b) Requires a broadband connection from the user's location;
- (c) Requires Internet protocol-compatible customer premises equipment; and
- (d) Permits users generally to receive calls that originate on the public switched telephone network and to terminate calls to the public switched telephone network.

This concludes my affidavit.



David Nichols
President, AT&T Missouri

Subscribed and sworn to before me this 27th day of August, 2008.


Notary Public

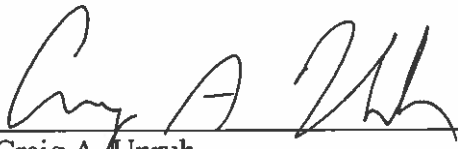
My Commission Expires: January 13, 2012



CITY OF ST. LOUIS)
)
STATE OF MISSOURI) SS

VERIFICATION

I, Craig A. Unruh, being duly sworn upon my oath, state that I am over twenty-one, sound of mind, and Executive Director-Regulatory of AT&T Services, Inc. I am authorized to act on behalf of Southwestern Bell Telephone Company, d/b/a AT&T Missouri, regarding the foregoing document. I have read it and verify that the facts contained in it are true and correct according to the best of my knowledge, information and belief.

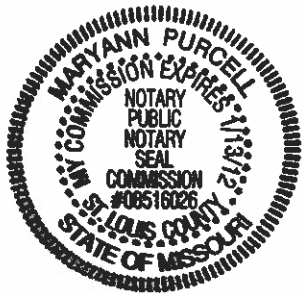


Craig A. Unruh

Sworn and subscribed to before me this 28th day of August, 2008.

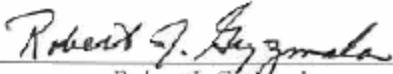


Notary Public



CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the above and foregoing document was delivered by first class mail, electronic mail or hand delivery, on this 28th day of August, 2008 to the following parties:


Robert J. Gryzmala

General Counsel
Kevin Thompson
Missouri Public Service Commission
P.O. Box 360
Jefferson City, MO 65102
gencounsel@psc.mo.gov
kevin.thompson@psc.mo.gov

Public Counsel
Michael F. Dandino
Office of Public Counsel
PO Box 7800
Jefferson City, MO 65102
opcservice@ded.mo.gov
mike.dandino@ded.mo.gov