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July 11, 2000

Mr. Dale Hardy Roberts Secretary/Chief Regulatory Law Judge Missouri Public Service Commission P.O. Box 360 Jefferson City, Missouri 65102

TO-2000-667 Re:

Resale of SWBT's Local Plus Service

Dear Mr. Roberts:

Enclosed for filing in the above-referenced matter, please find an original and eight copies of the Proposed Procedural Schedule on behalf of the Small Telephone Company Group.

Please see that this filing is brought to the attention of the appropriate Commission personnel. Copies of the enclosed document are being provided to counsel of record.

I thank you in advance for your cooperation in this matter.

Sincerely,

ly, mant Brian T. McCartney

BTM/lar Enclosure

Counsel of Record cc:

BEFORE THE PUBLIC SERVICE COMMISSION OF THE STATE OF MISSOURI

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To the D.C. of a Caller Towns of a called South Ann	`	Service Commission
In the Matter of the Investigation into the)	odivice Comublic
Effective Availability for Resale of Southwestern)	Johnmission
Bell Telephone Company's Local Plus Service by)	CASE NO. TO-2000-667
Interexchange Companies and Facilities-Based)	
Competitive Local Exchange Companies.)	

PROPOSED PROCEDURAL SCHEDULE

COMES NOW the Small Telephone Company Group ("STCG"), pursuant to the Missouri Public Service Commission's ("Commission") May 24, 2000 Order Directing Filing of Procedural Schedule, and for their proposed procedural schedule respectfully states as follows:

1. On July 7, 2000, Intervenors ALLTEL Communications, Inc. ("ACI") and AT&T Communications of the Southwest, Inc. ("AT&T") filed a joint procedural schedule proposal that includes the following dates:

September 1, 2000 Discovery begins

September 20, 2000 Discovery responses due

October 2, 2000 Direct Testimony (all parties)

October 23, 2000 Rebuttal Testimony (all parties)

November 8-9, 2000 Hearing

The STCG believes that these dates are appropriate, and the STCG concurs in ACI and AT&T's proposed procedural schedule. The STCG is concerned with resolving all of the issues related to the Resale of Local Plus in an expeditious manner, and ACI and AT&T's proposed procedural schedule allows sufficient time for the Commission to address *all* of the issues identified by the parties thus far.



- 2. Also on July 7, 2000, Southwestern Bell Telephone Company ("SWBT") filed a motion to extend the time to file a procedural schedule. SWBT suggested that it was inappropriate to set a procedural schedule in this case until the investigation's scope is defined, and SWBT stated "[i]f the Commission were to decide to expand this investigation to consider issues being raised by MITG and STCG, the scope of the Commission's investigation potentially could double." The STCG believes that the issues it has identified can and should be addressed in this proceeding, and the STCG disagrees with SWBT's implication that the STCG's issues could delay the resolution of this case in any way.
- 3. As stated previously, the issues raised by the STCG can be addressed within the procedural schedule proposed by ACI and AT&T. The STCG's issues do not involve complex calculations or lengthy discovery. For example, the STCG simply seeks a Commission determination as to what constitutes "resold" Local Plus service. Because SWBT is responsible for providing records of "resold" Local Plus service, the Commission need only consider the question of who will be responsible for compensating terminating LECs and what compensation records will be created to facilitate such compensation when Local Plus is provisioned by a CLEC on a basis other than resale. This question is a straightforward choice between two options, and the Commission has a simple choice of making either SWBT or the originating entity responsible for paying compensation and providing appropriate records. This determination should not delay the Commission's decision in this case.

WHEREFORE, the Small Telephone Company Group respectfully requests that the Commission issue an Order: (1) adopting ACI and AT&T's joint proposed procedural schedule in this case, and (2) for such other orders as are reasonable in the circumstances.

Respectfully submitted,

W.R. England, III

Mo. Bar #23975

Brian T. McCartney

Mo. Bar #47788

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Attorneys for the Small Telephone Company Group

Certificate of Service

I hereby certify that a true and correct copy of the above and foregoing document was mailed or hand-delivered, this 11th day of July, 2000 to:

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