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September 26, 2000

The Honorable Dale Hardy Roberts
Secretary/Chief Regulatory Law Judge
Missouri Public Service Commission
200 Madison Street, Suite 100
Jefferson City, MO 65101

FILED

SEP 26 2000

Missouri Public
Service Commission

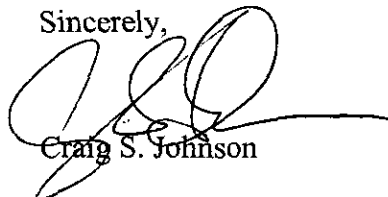
Re: Case No. TO-99-593

Dear Judge Roberts:

Enclosed for filing in the above-captioned case are an original and eight copies of the MITG's Reply to Motion to Establish Procedural Schedule.

Thank you for bringing this matter to the attention of the Commission.

Sincerely,



Craig S. Johnson

CSJ:tr
Enc.

BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI

FILED

SEP 26 2000

Missouri Public
Service Commission

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

Case No. TO-99-593

Reply to Motion to Establish Procedural Schedule

Comes now the MITG, and for its Reply to the September 22 Joint Motion of SWB, Sprint, and Staff to establish a procedural schedule culminating in a March, 2000 hearing, and for opposition to that Motion states as follows:

1. The Joint Motion suggests a schedule that would not result in hearing until March 12, 2001. This is unacceptable to the MITG. It is contrary to a prior agreement between the parties. It has already taken too long to get this docket ready for the establishment of a procedural schedule. Small LECs are suffering from a discrepancy in terminating usage compared to compensation caused by the attempt to create billing records at originating switches, instead of terminating end offices.

2. This docket was established by Order on June 10, 1999 in TO-99-254. This docket was established to address terminating compensation issues which had previously been litigated in TO-99-254, and its predecessor, TO-97-217. The Commission in its Order of August 12, 1999 in this case originally requested a procedural schedule be filed by October 21, 1999. The parties agreed to engage in discussions, workshops, and recording tests. On October 15, 1999 Staff requested an extension until 30 days after February 22, 2000 to file a procedural schedule. At that time it was

believed by the MITG that a procedural schedule would be filed by March 23, 2000, over six months ago. The Commission in its Order of November 1, 1999 extended the date for filing a procedural schedule until March 23, 2000. Although the workshops were conducted, arranging a recording test was not completed by March 23. On March 23, 2000, Staff filed a request for a six month extension to file a procedural schedule. By Order of April 17, 2000, the Commission granted an extension until September 22, 2000. The recording test among certain ILECs was discussed, scheduled, and postponed. It was not actually conducted until July 16 and 17, 2000.

3. The small ILECs have consistently maintained that the time schedule for performing a recording test should not impact the establishment of a procedural schedule in this case. The October 20 date for issuance an industry report was not to effect the procedural schedule. The loss of two work weeks in analyzing the data was due to problems in the call data submitted by Sprint. Under the schedule proposed by MITG, and tentatively agreed to by SWB, Sprint, and GTE, direct testimony is not due until December 1. Even with the delay in the records analysis caused by Sprint, this procedural schedule can be met.

4. On August 11, 2000, counsel for ILECs MITG, STCG, SWB, GTE/Verizon, and Sprint conducted a conference call with respect to establishing a procedural schedule. At that call it was tentatively agreed to submit the schedule contained in the MITG's September 12 Motion for Adoption of Procedural Schedule, which called for a hearing beginning January 24, 2001. At that time the delay in the record analysis caused by Sprint was known, discussed, and accomodated in the scheduled filed by MITG.

5. In order to inform all parties of the schedule the ILECs had tentatively agreed to, and to assure compliance with the Commission's prior Order directing the filing of a procedural schedule by September 22, on September 12 the MITG filed its Motion to Adopt a Procedural Schedule. Between the August 11 conference call and the September 12 MITG Motion to Adopt Procedural Schedule, neither SWB nor Sprint nor GTE communicated any dissatisfaction with the schedule tentatively agreed upon.

6. At a conference call on or about September 20, SWB requested that the small companies consent to a delay in the procedural schedule. The schedule SWB requested was similar to the one contained its September 22 Joint Motion, but it also contained additional time to conduct a second recording test prior to the filing of testimony. Generally, the July 2000 recording test showed that call matching was more of a problem for companies interconnected with SWB than for companies interconnected with GTE or Sprint. As they had no need or desire for another test, the small companies refused. GTE does not want a second test, as set forth in its Motion to adopt SWB's procedural schedule.

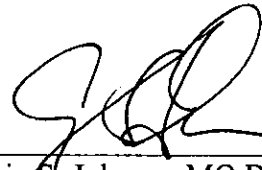
7. The small companies have maintained that, while a test would provide all parties with a measurement of the efficacy of the existing system, it was not to be used to attempt to change the systems in place that this docket was to investigate. SWB's second test proposal is merely an attempt by SWB to change and improve its systems before hearing. Agreeing upon the parameters of the July test, and actually conducting the test, has thus far consumed 6-9 months, and is not yet complete. A second test is not justified. The terminating compensation discrepancy still exists. Each month of delay costs small ILECs more in ongoing losses. Each month of delay makes the retroactive (back to PTC

Plan termination) compensation issue larger. No compelling reason has been submitted to delay the case even further than it has been delayed between October of 1999 and now.

8. There is sufficient time between now and January under the small companies' proposed procedural schedule for all parties to prepare their testimony and for hearing, including analysis of the July record test data.

WHEREFORE, the MITG requests that the Commission adopt the proposed procedural schedule submitted by the MITG, and the schedule proposed by SWB be rejected.

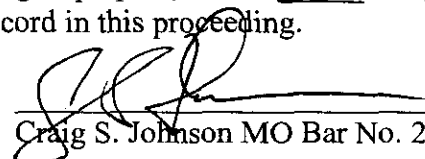
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CERTIFICATE OF SERVICE

The undersigned does hereby certify that a true and accurate copy of the foregoing was mailed, via U.S. Mail, postage prepaid, this 26 day of September, 2000, to all attorneys of record in this proceeding.



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