

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

In the Matter of a Proposed Rule to Require     )  
all Missouri Telecommunications Companies     )  
to Implement an Enhanced Record Exchange     )  
Process to Identify the Origin of IntraLATA     )  
Calls Terminated by Local Exchange Carriers.     )

**Case No. TX-2003-0301**

**COMMENTS BY CENTURYTEL OF MISSOURI, LLC AND  
SPECTRA COMMUNICATIONS GROUP, LLC D/B/A CENTURYTEL**

CenturyTel of Missouri, LLC ("CenturyTel") and Spectra Communications Group, LLC d/b/a CenturyTel ("Spectra") respectfully file these comments in opposition to the Missouri Public Service Commission's Proposed Rule, "Chapter 29 – Enhanced Record Exchange Rule," published in the January 3, 2005 edition of the *Missouri Register*.<sup>1</sup> CenturyTel and Spectra respectfully suggest that the proposed rule is unnecessary, and that it will create inefficiencies and resulting unnecessary, increased costs on Missouri's telecommunications industry.

While the companies are cognizant of intercompany compensation issues having been raised and addressed in complaints addressing uncollectible traffic carried over the LEC-to-LEC network, it appears that such issues have mostly been resolved. It is important to note that neither CenturyTel nor Spectra have received any complaints from terminating carriers in this regard. Under the terms of the proposed rule, CenturyTel has two terminating carriers that subtend its network, ALLTEL Missouri, Inc. and Peace Valley Telephone Company, Inc., and neither carrier has expressed concerns regarding record exchanges occurring thereon.

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<sup>1</sup> Volume 30, *Missouri Register*, pages 49-67.

However, by the terms of the Proposed Rule, no traffic other than that originating via the use of feature group C protocol can be terminated on the LEC-to-LEC network. (4 CSR 240-29.030.) As a result, CenturyTel would have to require every interexchange carrier ("IXC") to direct connect with each ILEC to avoid putting Feature Group D ("FGD") traffic on what are now common trunks, or be forced to provide a separate tandem trunk group to carry tandem routed FGD traffic. Such artificial and unreasonable restrictions on how CenturyTel's network facilities may be used will create inefficiencies and increase costs. In addition, Subparagraph 7 of this section of the Proposed Rule would appear to require immediate modification of existing interconnection agreements to comply with the rule, unless a variance has been granted. Such a requirement could only be applied on a prospective basis, with the rule's provisions taking effect on an agreement's expiration. And yet, in the fiscal note analysis by Staff, it is suggested that interconnection agreements "are not expected to be affected by this proposed rule." (IV. Assumptions, pp. 56-57.)

4 CSR 240-29.050(2), Option to Establish Separate Trunk Groups for LEC-to-LEC Telecommunications Traffic, provides that "A transiting carrier may opt to not install separate trunk groups to a requesting terminating carrier if the transiting carrier assumes financial responsibility for all compensable transiting traffic delivered to the terminating carrier." The inclusion of such a provision is a de facto mandate of a change in the business relationship between telecommunications carriers, which the Commission has consistently refused to adopt. In its January 28, 2003 "Order Denying Motion" in Case No. TO-99-593,

the Commission denied a motion by the Small Telephone Company Group and Missouri Independent Telephone Company Group to implement their business relationship proposal, thereby refusing “to simply shift upstream the responsibility for uncompensated traffic.”<sup>2</sup> Indeed, in its “Order Denying Motion to Consolidate” issued in this rulemaking proceeding on April 15, 2003, the Commission stated that “It would be both inappropriate and inexpedient to address the MITG/STCG business relationship proposal once again in the context of the unrelated issues in this rulemaking proceeding.”<sup>3</sup>

4 CSR 240-29.060, Special Privacy Provisions for End Users Who Block Their Originating Telephone Number, and 4 CSR 240-29.150, Confidentiality, should be eliminated, as both subject areas are addressed in Chapters 32 and 33, respectively. Any future revisions that can be justified should be addressed in those Chapters.

Respectfully submitted,

  
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<sup>2</sup> Order Denying Motion, Case No. TO-99-593, *In the Matter of the Investigation into Signaling Protocols, Call Records, Trunking Arrangements, and Traffic Measurement*, January 28, 2003, page 2.

<sup>3</sup> Order Denying Motion To Consolidate, Case No. TX-2003-0301, April 15, 2003, pages 1-2.

## CERTIFICATE OF SERVICE

I do hereby certify that a true and correct copy of the foregoing document has been hand-delivered, transmitted by e-mail or mailed, First Class, postage prepaid, this 2nd day of February, 2005, to:

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/s/ Larry W. Dority  
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