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

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In the Matter of the Modification of the Requirement for the Submission of Surveillance Data Reports by Sprint Missouri, Inc.

Case No.

## SPRINT MISSOURI, INC.'S PETITION TO MODIFY REQUIREMENT FOR THE SUBMISSION OF <u>SURVEILLANCE DATA REPORTS</u>

COMES NOW Sprint Missouri, Inc. ("Sprint") and, pursuant to 4 CSR 240-2.080, respectfully petitions the Missouri Public Service Commission ("Commission") to issue its Order modifying the requirement for the submission of Surveillance Data Reports ("Surveillance Reports") by Sprint to the Commission's Financial Analysis Department. Sprint's request mirrors the relief granted CenturyTel in Case No IO-2004-0360. In support of its Petition, Sprint states as follows:

1. The legal name and principal place of business of Sprint is:

Sprint Missouri, Inc. 6200 Sprint Parkway Overland Park, KS 66251

2. Sprint is a Missouri corporation with offices at 319 Madison, Jefferson City, Missouri 65102. Sprint is authorized to transact business within the State of Missouri and is authorized by the Missouri Public Service Commission ("Commission") to provide basic local and interexchange telecommunications service within the state. Sprint was originally incorporated in Missouri in 1929 as The United Telephone Company. A restatement of its certification was received in Case No. TA-88-87. Sprint

has received all necessary Commission and Secretary of State's Office approvals for subsequent name changes and is a corporation in good standing in Missouri. Evidence of proper name registrations was most recently provided to this Commission in Case No. TO-97-53 (Re: United Telephone Company of Missouri's Adoption Notice Designed to Change the Company's Name to United Telephone Company of Missouri d/b/a Sprint) and Case No. TO-98-107 (Application of United Telephone Company of Missouri d/b/a Sprint for Approval of Name Change to Sprint Missouri, Inc.) Sprint requests that the information in those cases be incorporated herein by reference. All correspondence, communications, and order and decisions of the Commission issued in this matter should be sent to:

> Lisa Creighton Hendricks Sprint Missouri, Inc. 6450 Sprint Parkway KSOPHN0212-2A253 Overland Park, KS 66251 Telephone: (913) 315-9363 Facsimile: (913) 523-9829 Email: moreg@mail.sprint.com

3. Sprint has no pending action or final unsatisfied judgments or decisions against it from any state or federal agency or court which involve customer service or rates, which action, judgment or decision has occurred within three (3) years of the date of the Application. No Missouri annual reports or assessment fees are overdue.

4 Sprint currently submits surveillance data reports to the Commission's Financial Analysis Department on a monthly basis. Pursuant to discussions with the Commission's Staff, and in furtherance of Sprint's desire to lessen the administrative burden and resource demands associated with monthly submissions, Sprint respectfully

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petitions the Commission to issue an Order modifying the current monthly submission requirement to a semi-annual submission requirement. Moreover, pursuant to the Commissions Order in IO-2004-0360,<sup>1</sup> Sprint is willing to provide and maintain a point of contact to respond to Staff questions related to information provided in the surveillance reports with responses being provided within five business days of requests.

WHEREFORE, Sprint Missouri, Inc. respectfully petitions the Commission to issue an Order modifying the current monthly submission requirement of surveillance reports by Sprint, so as to require Sprint to submit surveillance data reports in accordance with the Commission's standard format for its Surveillance utility Reporting Tracking System to the Auditing Department every six (6) months.

Respectfully submitted,

Lisa Creighton Hendricks MO Bar # 42194 Sprint Missouri, Inc. 6450 Sprint Parkway KSOPHN0212-2A253 Overland Park, KS 66251 Telephone: (913) 315-9363 Facsimile: (913) 523-9829 Email: moreg@mail.sprint.com

Attorney for Sprint Missouri, Inc.

<sup>&</sup>lt;sup>1</sup> Order Granting Petition to Modify Requirement for Submission of Surveillance Data issued in Case No. IO-2004-0360.

## 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  $21^{+}$  day of  $00^{-}$ , 2004, to:

Dana K. Joyce General Counsel Missouri Public Service Commission P.O. Box 360 Jefferson City, MO 65102

Office of the Public Counsel P.O. Box 2230 Jefferson City, MO 65102 Michael Dandino Senior Public Counsel P.O. Box 2230 Jefferson City, MO 65102

William K. Haas Deputy General Counsel Missouri Public Service Commission P.O. Box 360 Jefferson City, MO 65102

Lisa Creighton Hendricks