

Stephen D. Minnis Senior Attorney Sprint Corporation 5454 West 110th Street Overland Park, KS 66211 Voice 913 345 7918 Fax 913 345 7568 steve.minnis@mail.sprint.com

January 19, 2001

JAN 1 9 2001

The Honorable Dale Hardy Roberts Secretary/Chief Regulatory Law Judge Missouri Public Service Commission 200 Madison Street, Suite 650 P O. Box 360 Jefferson City, Missouri 65101

Missouri Public Service Commission

Re:

In the Matter of the Investigation Into Signaling Protocols, Call Records,

Trunking Arrangements, and Traffic Measurement

Case No. TO-99-593

Dear Judge Roberts:

Please accept for filing with the Commission an original and nine (9) copies of Sprint's Statement of Position in the above-entitled matter.

If you have any questions or comments, please do not hesitate to call me at (913) 345-7918.

Sincerely,

Stephen D. Minnis by Dais Bargnuyer

SDM:mkj

cc: All Parties of Record

BEFORE THE PUBLIC SERVICE COMMISSION STATE OF MISSOURI

		RVICE COMMISSION SSOURI	FILED3
In the Matter of the Investigation into Signaling Protocols, Call Records, Trunking Arrangements, and Traffic Measurement.)))	S _{O/7} Case No. TO-99-593	Missouri Public Commission

SPRINT'S STATEMENT OF POSITION

COMES NOW, Sprint Missouri, Inc. and Sprint Communications Company, L.P., and hereby submits its Statement of Position in the above-captioned matter. This Statement of Position will follow the List of Issues outline.

1. Signaling Protocols - Is it necessary for the Commission to decide in this case what signaling protocols should be utilized for intrastate intraLATA traffic terminating over the common trunks between the former PTCs and the former SCs? **Sprint's Position:**

It is not necessary for the Commission to decide in this case what signaling protocols should be utilized for intrastate intraLATA traffic terminating over the common trunks between the former PTCs and the former SCs. The signaling protocol issue has already been investigated by the Commission in Docket No. TO-99-254, et. al.. In that docket, the Commission found that neither FGC or FGD provided all the information necessary, but that FGC offered the greatest potential for an ultimate solution.

2. Traffic Measurement - How and where should intrastate intraLATA traffic terminating over the common trunks between the former PTCs and the former SCs be measured for purposes of terminating compensation?

Sprint's Position:

Intrastate intraLATA traffic terminating over common trunks between former PTCs and former SCs should be measured at the originating carriers' switch.

3. <u>Call Records</u> - What call records should be utilized for intrastate intraLATA traffic terminating over the common trunks between the former PTCs and the former SCs?

Sprint's Position:

In Docket No. TO-99-254, et al. the Commission previously ordered the former PTCs to create Category 11 records for intrastate intraLATA traffic terminating to the former SCs over the common trunks between the former PTCs and the former SCs. The PTCs have made system changes in order to implement the Category 11 record-keeping process requested by the former SCs. Category 11 records should continue to be used.

4. <u>Trunking Arrangements</u> - What changes, if any, should be made to the existing common trunking arrangements between the former PTCs and the former SCs?

Sprint's Position:

There are no changes required for the existing common trunking arrangements between the former PTCs and former SCs.

5. <u>Business Relationships</u> - What business relationship should be utilized for payment for intrastate intraLATA traffic terminating over the common trunks between the former PTCs and the former SCs?

Sprint's Position:

The current business relationship for intrastate intraLATA traffic terminating over the common trunks between the former PTCs and former SCs should continue to be utilized.

6. <u>Call Blocking</u> - What procedure or arrangement, if any, should be utilized to prevent noncompensated intrastate intraLATA traffic from continuing to terminate over the common trunks between the former PTCs and the former SCs?

Sprint's Position:

There should not be unilateral blocking of traffic implemented by any company. However, if the Commission orders or condones such action, one solution could be to segregate the traffic in question for blocking by the terminating LEC, to the extent such action is technically possible.

Respectfully submitted, SPRINT MISSOURI, INC. SPRINT COMMUNICATIONS COMPANY, L.P.

Stephen D. Minnis, Ks. Bar #12442

5454 W. 110th Street Overland Park, KS 66211

Tele. (913) 345-7915 Fax: (913) 345-7754

steve.minnis@mail.sprint.com

Paul Gardner, Mo. Bar #28159

Goller, Gardner & Feather

131 High Street

Jefferson City, MO 65101

Tele. (573) 635-6181 Fax (573-635-1155

info@gollerlaw.com

CERTIFICATE OF SERVICE

I HEREBY certify that copies of the foregoing document were served on this 19th day of January, 2001 via U.S. Mail, first class postage prepaid, to each of the following parties:

Mr. Dan Joyce General Counsel Missouri Public Service Commission Governor Office Building 200 Madison Street, Suite 650 Jefferson City, Missouri 65102

Ms. Martha Hogerty
Office of the Public Counsel
P. O. Box 7800
Jefferson City, Missouri 65102

Mr. Michael Dandino
Office of the Public Counsel
Governor Office Building
200 Madison Street, Suite 650
Jefferson City, Missouri 65102

Mr. Paul S. DeFord Lathrop & Gage 2345 Grand Blvd Kansas City, Missouri 64108

Mr. W. R. England III Brydon Swearengen & England P.O. Box 456 Jefferson, City, Missouri 65102 Mr. Dave Evans GTE Midwest Incorporated 601 Monroe St., Suite 304 Jefferson City, Missouri 65101

Mr. Jim Fischer Fischer & Dority PC 101 Madison Street, Suite 400 Jefferson City, Missouri 65101-3015

Mr. Keith Krueger
Deputy General Counsel
Missouri Public Service Commission
Governor Office Building
200 Madison Street, Suite 650
Jefferson City, Missouri 65102

Mr. Paul Lane
Mr. Tony Conroy
Mr. Leo Bub
Southwestern Bell Telephone Company
One Bell Center,
Room 3518
St. Louis, Missouri 63101

Rose Mulvaney Birch Telecom 2020 Baltimore Kansas City, Missouri 64104

Stephen D. Minnis by Down Bougneyer