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**FILED**  
**SEP 15 1997**  
**MISSOURI**  
**PUBLIC SERVICE COMMISSION**

September 15, 1997

Cecil I. Wright  
Executive Secretary  
Missouri Public Service Commission  
P.O. Box 360  
Jefferson City, Missouri 65102

**Re: In the Matter of the Joint Application of GTE Midwest Incorporated and GTE Arkansas Incorporated and Dial Call, Inc. For Approval of Interconnection Agreement; Case No. TO-98-41**

Mr. Wright:

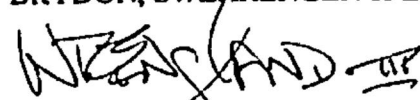
Enclosed please find the original plus fourteen (14) copies of Comments of The Small Telephone Company Group and Fidelity Telephone Company and Bourbeuse Telephone Company for filing in the above referenced matter. Please bring this to the attention of the appropriate personnel. A copy of this filing is being sent to all parties of record.

Thank you for your attention to this matter. If you have any questions or require additional information, please do not hesitate to give me a call.

Sincerely,

BRYDON, SWEARENGEN & ENGLAND P.C.

By:

  
W.R. England, III

WRE/k

Enclosures

cc: Office of Public Counsel  
James C. Stroo  
Joel Margolis

BEFORE THE PUBLIC SERVICE COMMISSION  
STATE OF MISSOURI

FILED  
SEP 15 1997  
MISSOURI  
PUBLIC SERVICE COMMISSION

In the Matter of the Joint Application                    )  
of GTE Midwest Incorporated and                        )  
GTE Arkansas Incorporated and Dial                    )  
Call, Inc. For Approval of                                ) Case No. TO-98-41  
Interconnection Agreement Under                        )  
The Telecommunications Act of 1996.                    )

COMMENTS OF THE SMALL TELEPHONE COMPANY GROUP

The Small Telephone Company Group ("STCG"), Fidelity Telephone Company and Bourbeuse Telephone Company ("Fidelity") (collectively referred to as "STCG") submit the following Comments regarding the approval of the interconnection agreement between by GTE Midwest Incorporated and GTE Arkansas Incorporated (collectively GTE) and Dial Call, Inc., (Nextel).

This agreement is another in an ongoing series of agreements entered into by various large local exchange carriers (LECs) establishing interconnection relationships between the LEC and a wireless carrier that deal, in part, with the transporting of and origination and termination of traffic to other LECs who subtend the large LEC's tandem switches. As is the case with several agreements entered into by Southwestern Bell Telephone Company (SWBT), the instant agreement calls for GTE to terminate to LECs subtending their access tandems, the traffic originated by Nextel.

While pursuant to this agreement, Nextel assumes responsibility for compensating the non-GTE LECs for traffic that is ultimately terminated to them, the STCG has considerable concerns regarding how this will be accomplished. The terminating traffic originated by Nextel that is terminated to a LEC end office through GTE's tandem switch will be indistinguishable from other

traffic that GTE terminates to that LEC through its common trunk group. The LEC will have no way of knowing if, or how much, Nextel traffic may be terminated without receiving specific reports from Nextel or GTE regarding the Nextel traffic being terminated to the LEC. Neither GTE nor Nextel has offered to the STCG member companies whether such reports will be provided or how such reports will be provided nor how the non-GTE end office LEC will be able to determine what amounts should be billed to Nextel..

Further, the STCG has concerns that the number of interconnection agreements between large LECs and wireless carriers will proliferate to the point where small LECs will have a considerable administrative burden placed upon them to administer such contracts and billing arrangements for small amounts of traffic. The STCG believes that many of these issues could be better administered and controlled by establishing different business relationships from those proposed in the instant agreement. Such relationships would place LECs providing tandem switches, such as GTE, in a wholesale provider position where they would provide full compensation for terminating traffic to those companies that subtend them and to whom they deliver traffic, rather than requiring the end office company to enter into a business relationship with the wireless carrier. This would considerably simplify business relationships between carriers and would limit those relationships to carriers that actually physically connect their networks.

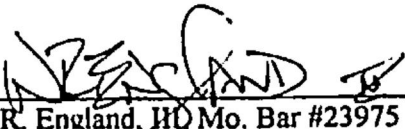
The STCG notes that Appendix C to the proposed interconnection arrangement calls for initial compensation arrangements between GTE and Nextel that assume that 90% of the total traffic exchanged by the two parties will be from the wireless carrier to the LECs and only 10% of the traffic will be from the LEC to the wireless carrier. This emphasizes the general direction of the traffic from wireless carrier to LEC and the financial interest that wireless carriers may have in

in not vigorously pursuing terminating agreements with LECs with whom they do not physically connect their networks.

The STCG has raised the issue of terminating traffic business relationships in Case No. TO-97-217, the PTC docket, and will be presenting it formally as well in Case No. TT-97-524, the SWBT wireless tariff docket. However, results from neither of these cases will likely impact the business relationships between GTE and the LECs that subtend them. The STCG point these issues out to the Commission so it will be aware that the business relationships proposed in this interconnection agreement are not the only ones that may be appropriate and that at some time the Commission should review such relationships, whether now or possibly in the future, to determine whether they are equitable for those with whom the wireless carriers do not physically connect their networks.

For these reasons the STCG and Fidelity respectfully request that the Commission carefully consider its approval of the interconnection agreement and whether it meets the standards for approval set out in Section 252(e) of the Act.

Respectfully submitted,

  
W.R. England, II, Mo. Bar #23975  
Sondra B. Morgan, Mo. Bar #35482  
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Jefferson City, MO 65102

Attorneys for The Small Telephone Company Group  
and Fidelity

Certificate of Mailing

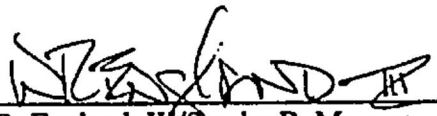
I hereby certify that a true and correct copy of the above and foregoing documents was mailed, United States Mail, postage prepaid, this 15 day of September, 1997, to the following:

James C. Stroo  
1000 GTE Drive  
Wentzville, MO 63385

Joel M. Margolis  
1505 Farm Credit Drive  
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Jefferson city, MO 65102

Missouri Public Service Commission  
P.O. Box 360  
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W.R. England, III/Sondra B. Morgan