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January 19, 2001

FILED³

JAN 19 2001

Mr. Dale Hardy Roberts
Secretary/Chief Regulatory Law Judge
Missouri Public Service Commission
P. O. Box 360
Jefferson City, MO 65102

Missouri Public
Service Commission

Re: Case No. TO-99-593

Dear Mr. Roberts:

Enclosed for filing in the above-referenced case, please find the original and 8 copies of the **Statement of Position of the Office of the Public Counsel**. I have on this date mailed, faxed, and/or hand-delivered the appropriate number of copies to all counsel of record. Please "file" stamp the extra-enclosed copy and return it to this office.

Thank you for your attention to this matter.

Very truly yours,

Michael F. Dandino
Senior Public Counsel

MFD:kh

cc: Counsel of Record

Enclosure

BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI

FILED³
JAN 19 2001
Missouri Public
Service Commission

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

Case No. TO-99-593

STATEMENT OF POSITIONS OF THE OFFICE OF THE PUBLIC COUNSEL

COMES NOW the Office of the Public Counsel and states the following as its positions on the agreed upon issues in the case:

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?

OPC: Public Counsel does not take a position on this issue at this time, but reserves the right to file a brief on this issue based upon the entire hearing record in this case.

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?

OPC: Public Counsel does not take a position on this issue at this time, but reserves the right to file a brief on this issue based upon the entire hearing record in this case.

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

OPC: Public Counsel does not take a position on this issue at this time, but reserves the right to file a brief on this issue based upon the entire hearing record in this case.

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

OPC: Public Counsel does not take a position on this issue at this time, but reserves the right to file a brief on this issue based upon the entire hearing record in this case.

5. **Business Relationships.** 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?

OPC: Public Counsel does not take a position on this issue at this time, but reserves the right to file a brief on this issue based upon the entire hearing record in this case.

6. **Call Blocking.** 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?

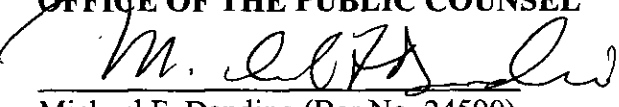
OPC: Public Counsel is not proposing any specific procedure or arrangement, but states that it opposes blocking of traffic to customers as a collection tool for intercompany compensation. Blocking places undue burden on the consumer who is an innocent party. It also may pose a threat to the health, safety, and general welfare of the citizens and may undermines

the public's confidence in the integrity of the public switched network. The companies have other judicial and regulatory alternatives to blocking.

Respectfully submitted,

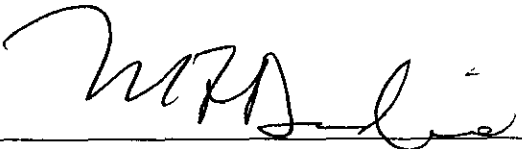
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Certificate of Service

I hereby certify that copies of the foregoing have been mailed, e-mailed or hand-delivered to all counsel of record as shown on the attached service list this 19th day of January 2001.



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January 19, 2001

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