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September 18, 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 65102

Missouri Public Service Commission
SEP 19 2001
FILED 2

Re: In the Matter of the Investigation of the State of Competition in the
Exchanges of Southwestern
Case No. TO-2001-467

Dear Judge Roberts:

Please accept for late filing, an original and eight (8) copies of Sprint's Position Statement in the above matter.

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

Very truly yours,

Lisa Creighton Hendricks

/vw

Enclosures

cc: General Counsel
Office of the Public Counsel
All Parties of Record

BEFORE THE PUBLIC SERVICE COMMISSION
STATE OF MISSOURI

FILED²
SEP 19 2001

Missouri Public
Service Commission

In The Matter of the Investigation of the State)
Of Competition in the Exchanges of Southwestern)
Bell Telephone Company)

Case No. TO-2001-467

POSITION STATEMENT

COMES NOW Sprint Communications Company, L.P. ("Sprint"), and hereby provides the following Position Statement.

ISSUE 1. IN WHICH SOUTHWESTERN BELL TELEPHONE COMPANY ("SWBT") EXCHANGES, IF ANY, SHOULD SWBT'S SWITCHED SERVICES BE CLASSIFIED AS COMPETITIVE PURSUANT TO SECTION 392.245.5 RSMO 2000?

Sprint's Position: To the extent that this issue includes switched access, see Sprint's statement of position on Issue No. 12. For other switched services, Sprint has not taken a position.

ISSUE 2. IN WHICH SWBT EXCHANGES, IF ANY, SHOULD SWBT'S BUSINESS LINE RELATED SERVICES BE CLASSIFIED AS COMPETITIVE PURSUANT TO SECTION 392.245.5 RSMO 2000?

Sprint's Position: Sprint has not taken a position on this issue.

ISSUE 3. IN WHICH SWBT EXCHANGES, IF ANY, SHOULD SWBT'S HIGH CAPACITY EXCHANGE ACCESS LINE SERVICES BE CLASSIFIED AS COMPETITIVE PURSUANT TO SECTION 392.245.5 RSMO 2000?

Sprint's Position: Sprint has not taken a position on this issue.

ISSUE 4. IN WHICH SWBT EXCHANGES, IF ANY, SHOULD SWBT'S PLEXAR SERVICES BE CLASSIFIED AS COMPETITIVE PURSUANT TO SECTION 392.245.5 RSMO 2000?

Sprint's Position: Sprint has not taken a position on this issue.

ISSUE 5. IN WHICH SWBT EXCHANGES, IF ANY, SHOULD SWBT'S INTRALATA PRIVATE LINE/DEDICATED SERVICES BE CLASSIFIED AS COMPETITION PURSUANT TO SECTION 392.245.5 RSMO 2000?

Sprint's Position: Sprint has not taken a position on this issue.

ISSUE 6. IN WHICH SWBT EXCHANGES, IF ANY, SHOULD SWBT'S RESIDENTIAL ACCESS LINE SERVICES BE CLASSIFIED AS COMPETITIVE PURSUANT TO SECTION 392.245.5 RSMO 2000?

Sprint's Position: Sprint has not taken a position on this issue.

ISSUE 7. IN WHICH SWBT EXCHANGES, IF ANY SHOULD SWBT'S INTRALATA TOLL SERVICES BE CLASSIFIED AS COMPETITIVE PURSUANT TO SECTION 392.245.5 RSMO 2000?

Sprint's Position: Sprint has not taken a position on this issue.

ISSUE 8. IN WHICH SWBT EXCHANGES, IF ANY, SHOULD SWBT'S LOCAL PLUS SERVICES BE CLASSIFIED AS COMPETITIVE PURSUANT TO SECTION 392.245.5 RSMO 2000?

Sprint's Position: Sprint has not taken a position on this issue.

ISSUE 9. IN WHICH SWBT EXCHANGES, IF ANY, SHOULD SWBT'S OPTIONAL METROPOLITAN CALLING AREA (MCS) SERVICES BE CLASSIFIED AS COMPETITIVE PURSUANT TO SECTION 392.245.5 RSMO 2000?

Sprint's Position: Sprint has not taken a position on this issue.

ISSUE 10. IN WHICH SWBT EXCHANGES, IF ANY SHOULD SWBT'S WIDE AREA TELECOMMUNICATIONS SERVICES (WATS) AND 800 SERVICES BE CLASSIFIED AS COMPETITIVE PURSUANT TO SECTION 392.245.5 RSMO 2000?

Sprint's Position: Sprint has not taken a position on this issue.

ISSUE 11. IN WHICH SWBT EXCHANGES, IF ANY, SHOULD SWBT'S SPECIAL ACCESS SERVICES BE CLASSIFIED AS COMPETITIVE PURSUANT TO SECTION 392.245.5 RSMO 2000?

Sprint's Position: Sprint has not taken a position on this issue.

ISSUE 12. IN WHICH SWBT EXCHANGES, IF ANY, SHOULD SWBT'S SWITCHED ACCESS SERVICES BE CLASSIFIED AS COMPETITIVE PURSUANT TO SECTION 392.245.5 RSMO 2000?

Sprint's Position: SWBT's request to classify switched access, which includes local switching, common line and local transport, as competitive should be denied. When an end-user chooses a local service provider, the interexchange carrier must use that local service provider for switched access to that customer. Thus, there is no alternative to the local exchange provider and the services cannot be deemed competitive. Further, Sprint does not believe that appropriate competition triggers exist with switched access that would allow switched access to ever be classified as a competitive services.

ISSUE 13. IN WHICH SWBT EXCHANGES, IF ANY, SHOULD SWBT'S COMMON CHANNEL SIGNALING/SIGNALING SYSTEM 7 (SS7) SERVICES BE CLASSIFIED AS COMPETITIVE PURSUANT TO SECTION 392.245.5 RSMO 2000?

Sprint's Position: Sprint has not taken a position on this issue.

ISSUE 14. IN WHICH SWBT EXCHANGES, IF ANY, SHOULD SWBT'S LINE INFORMATION DATABASE (LIDB) SERVICES BE CLASSIFIED AS COMOPETITIVE PURSUANT TO SECTION 392.245.5 RSMO 2000?

Sprint's Position: Sprint has not taken a position on this issue.

ISSUE 15. IN WHICH SWBT EXCHANGES, IF ANY, SHOULD SWBT'S DIRECTORY ASSISTANCE (DA) SERVICES BE CLASSIFIED AS COMPETITIVE PURSUANT TO SECTION 392.245.5 RSMO 2000?

Sprint's Position: Sprint has not taken a position on this issue.

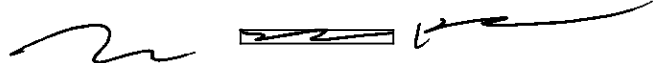
ISSUE 16. IN WHICH SWBT EXCHANGES, IF ANY, SHOULD SWBT'S OPERATOR SERVICES (OS) BE CLASSIFIED AS COMPETITIVE PURSUANT TO SECTION 392.245.5 RSMO 2000?

Sprint's Position: Sprint has not taken a position on this issue.

ISSUE 17. IN EACH EXCHANGE SERVED BY SWBT, WHICH IF ANY, ALTERNATIVE LOCAL EXCHANGE TELECOMMUNICATIONS COMPANY HAS BEEN CERTIFIED UNDER SECTION 392.455 RSMO 2000 AND HAS PROVIDED BASIC LOCAL TELECOMMUNICATIONS SERVICE IN THAT EXCHANGE FOR AT LEAST FIVE YEARS (OR IF NONE, WHAT IS THE LONGEST PERIOD OF TIME THAT A CERTIFIED ALTERNATIVE LOCAL EXCHANGE COMPANY HAS PROVIDED BASIC LOCAL TELECOMMUNICATIONS SERVICE IN THAT EXCHANGE)?

Sprint's Position: Sprint has not taken a position on this issue.

Respectfully submitted,
SPRINT



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CERTIFICATE OF SERVICE

I HEREBY certify that a copy of the above document was delivered to each of the following via U. S. Mail, postage prepaid on this 19th day of September, 2001 to the following:


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Dallas, TX 75247

Allegiance Telecom of Missouri Public
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Dallas, TX 75207-3118

American Communication Services
of Kansas City, Inc.
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Annapolis Junction, MD 20701

BarTel Communications, Inc.
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St. Louis, MO 63122

Brooks Fiber Communications of Missouri, Inc.
701 Brazos, Suite 600
Austin, TX 78701

2nd Century Communications, Inc.
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Tampa, FL 33614

Adelphia Business Solutions Operations, Inc.
121 Champion Way
Canonsburg, PA 15317

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Little Rock, AR 72203

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Jefferson City, MO 6501

Birch Telecom of Missouri, Inc.
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Kansas City, MO 64108

BTI (Business Telecome, Inc.)
4300 Six Forks Road, Suite 500
Raleigh, NC 27609

Buy-Tel Communications, Inc.
6409 Colleyville Boulevard
Colleyville, TX 76034

Camarato Distributing, Inc.
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Central Missouri Telecommunications, Inc.
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Osage Beach, MO 65065

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Houston, TX 77057

Computer Business Sciences, Inc.
80-02 Kew Gardens Road, Suite 5000
Kew Gardens, NY 11415

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Houston, TX 77005

Delta Phones, Inc.
P.O. Box 784
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Delhi, LA 71232

DMJ Communications, Inc.
2525 North Grandview, Ste 900
Odessa, TX 79761

DPi-Teleconnect, LLC
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Dallas, TX 75234

EZ Talk Communications, Inc.
4727 South Main
Stafford, TX 74777

Gabriel Communications of Missouri, Inc.
16090 Swingley Ridge Road
Chesterfield, MO 63017

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1221 Nicollet Mall, Suite 300
Minneapolis, MN 55403

Global Crossing Telemanagement, Inc.
(Formerly Frontier Telemanagement, Inc.)
1221 Nichollet Mall, Suite 300
Minneapolis, MN 55403

HJN Telecom, Inc.
3235 Satellite Blvd., Bldg. 400, Ste. 300
Duluth, GA 30096

Intermedia Communications, Inc.
1 Intermedia Way
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Ionex Communications, Inc.
5710 LBJ Freeway, Ste. 215
Dallas, TX 75240

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LDD, Inc.
24 South Minnesota
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Level 3 Communications, LLC
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Louisville, CO 80027

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14101 Wireless Way
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Maxcom, Inc.
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Max-TelCommunications, Inc.
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17 Research Park Drive
St. Charles, MO 63304

The Pager Company
3030 East Truman Road
Kansas City, MO 64127

Payroll Advance
808 South Baker
Mountain Home, AR 72643

Phones for All
(Teléfonos Parar Todos)
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Addison, TX 75001

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Qwest Communications Corporation
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Arlington, VA 22203

Ren-Tel Communications, Inc.
7337 S. Mitchell Ct.
Villa Rica, GA 30180

Simply Local Services, Inc.
2225 Apollo Dr.
Fenton, MO 63026

Smoke Signal Communications
(Choctaw Communications, LC)
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Houston, TX 77074

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Austin, TX 78752-2828

Suretel, Inc.
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Oklahoma City, OK 73127

TCG Kansas City, Inc.
Teleport Communications Group
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Staten Island, NY 10311

TCG St. Louis
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Staten Island, NY 10311

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(United States Telecommunications, Inc.)
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Teligent, Inc.
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Harlingen, TX 78551-2999

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