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September 29, 2000

FILED³
SEP 29 2000 *me*

Missouri Public
Service Commission

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

Re: Case No. TO-99-593

Dear Mr. Roberts:

Enclosed for filing in the above referenced matter, please find an original and eight (8) copies of STCG's Response to Motions to Establish Procedural Schedule in the above referenced case.

A copy of the attached will be provided to parties of record.

Please see that this filing is brought to the attention of the appropriate Commission personnel. I thank you in advance for your cooperation in this matter.

Sincerely,

Brian T. McCartney

Brian T. McCartney

BTM/lar

Enclosure

cc: Parties of Record

BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI

FILED³

SEP 29 2000

Missouri Public
Service Commission

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

CASE NO. TO-99-593

RESPONSE TO MOTIONS TO ESTABLISH PROCEDURAL SCHEDULE

Comes now the Small Telephone Company Group (hereinafter "STCG" or "Applicants") and states to the Missouri Public Service Commission ("Commission") as follows:

1. The Commission established this case on June 10, 1999 for the purpose of investigating "signaling protocols, call records, trunking arrangements and traffic measurement." The case arose as a result of the elimination of the Primary Toll Carrier ("PTC") Plan in Case No. TO-99-254 et al., and it was designed to address many of the issues that were not resolved at the end of the PTC case. One such issue is the accuracy and effectiveness of the former PTCs' recording and reporting of traffic that transits the Feature Group C ("FGC") network. A closely related issue is the present business relationship between the former PTCs and the small telephone companies (formerly Secondary Carriers or "SCs" under the PTC Plan) whereby the small companies' terminating end offices are required to rely upon the originating records prepared by the former PTCs for the purpose of billing access rather than terminating records.

2. On July 16-17, 2000, the parties conducted a terminating recording test, and a preliminary report of the results has been completed

3. On September 15, 2000, the Missouri Independent Telephone Company Group ("MITG") filed its Motion for Adoption of Procedural Schedule. The MITG proposed the following procedural schedule:

Direct Testimony	December 1, 2000
Rebuttal Testimony	December 20, 2000
Surrebuttal Testimony	January 12, 2001
Hearing	January 24-26, 2001

4. On September 21, 2000, the Small Telephone Company Group ("STCG") filed its Concurrence in the MITG's Motion for Adoption of Procedural Schedule.

5. On September 22, 2000, Southwestern Bell Telephone Company ("SWBT"), Sprint Missouri Inc. ("Sprint"), and the Commission's Staff ("Staff") (referred to collectively as "SWBT et al.") filed their Joint Motion to Establish Procedural Schedule. This motion proposed a procedural schedule approximately one and a half months behind the MITG's proposed procedural schedule.

6. On September 22, 2000, GTE Midwest d/b/a Verizon Midwest ("Verizon") filed its Motion to Establish Procedural Schedule. Verizon concurred in and supported the Joint Motion filed by SWBT/Sprint/Staff.

7. The STCG agrees with SWBT et al. that the industry test was a "significant undertaking" that has required a great deal of time and effort. However, the STCG cannot agree that this case should be further delayed. The results of the network test indicate exactly what the STCG has known for quite some time: records are not being passed for a substantial amount of traffic that is flowing to the member companies of the STCG. SWBT concedes this in the Joint Motion:

Southwestern Bell, during the course of its analysis, discovered that some of its switches (specifically its Ericsson switches) were not properly recording its Local Plus traffic.

It is critical for this case to now move forward. The Commission opened this case well over a year ago. In the interim, traffic has continued to terminate to the small companies without any records being passed or compensation paid. It is time to address this problem and establish an appropriate business relationship between Missouri's small telephone companies and the former PTCs.

8. This case been delayed long enough, and the delay continues to have a very real impact upon the small companies. SWBT et al. have repeatedly advised the Commission to "wait until Case No. TO-99-593" to address issues of immediate concern to the small companies. *See e.g.* Case Nos. TC-2000-325 et al. (SWBT's complaint against Mid-Missouri Telephone Company, Seneca and Goodman Telephone Companies, and Chariton Valley Telephone Corporation for blocking SWBT's 800 MaxiMizer traffic); Case No. TC-2001-20 (SWBT's complaint against Mid-Missouri Telephone Company (MMTC) concerning MMTC's plan to disconnect the LEC-to-LEC common trunk groups, and request for order prohibiting MMTC from disrupting customer traffic). Yet now that this case is finally being brought before the Commission, SWBT et al. seek further delay. In the meantime, traffic is terminating to the small companies, but the small companies are not receiving any records or compensation for the traffic. Without a clear, finite procedural schedule, this situation will not change.

9. SWBT et al. note that as a result of "unforeseen problems" they "have lost two weeks of their allotted work time for analyzing the unmatched records provided by the small companies' consultant." What SWBT et al. neglect to mention is that this delay was caused when an initial review of the matching results led to the discovery that one originating carrier had submitted incorrect records. That carrier subsequently provided updated records leading to the

need to reprocess the analysis.

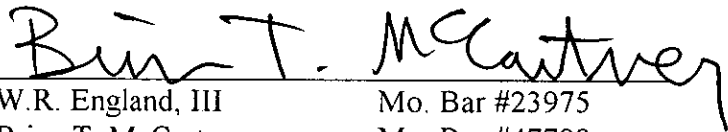
10. SWBT et al. further argue that they believe it is “necessary to run an additional, but smaller, test to verify that any system corrections made as a result of what was found in the initial Records Test cured any problems identified.” Verizon supports additional testing by SWBT et al., but Verizon indicates that it does not wish to participate in any further testing. The STCG is not opposed to the process of testing, and the STCG is willing to work with the parties to assure that the Commission is presented with the most accurate data available.

(A) Limited Testing. SWBT et al. propose “smaller scale” testing, and Verizon’s motion indicates that Verizon does not wish to participate in any further testing. The STCG does not believe a “smaller scale” test without the participation of all former PTCs is appropriate. The only way an additional test will work is if all of the former PTCs participate. Otherwise, the results of a second test will suffer from large gaps in data and be of little value. If SWBT et al. desire to perform another test, then another full scale test involving all of the former PTCs must be performed.

(B) Additional testing. The STCG is not opposed to additional testing, but the STCG is strongly opposed to any further delay of this case. If a second test can be conducted within the framework of the MITG’s proposed procedural schedule, then the STCG is willing to proceed with further testing. The STCG is also willing to participate in further testing outside the context of this case or after the conclusion of this case. However, the STCG should not be required to wait any longer to bring to the Commission the important policy questions presented by today’s system of recording and reporting traffic destined for the small companies.

WHEREFORE, for the reasons detailed above, the STCG respectfully requests that the Commission adopt the MITG's proposed procedural schedule and issue such other orders as are reasonable in the circumstances.

Respectfully submitted,

A handwritten signature in cursive script that reads "Brian T. McCartney". The signature is written in dark ink and is positioned above the printed names of the attorneys.

W.R. England, III

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Attorneys for the Small Telephone Company Group

Certificate of Service

I hereby certify that a true and correct copy of the above and foregoing document was mailed or hand-delivered, this 29th day of September, 2000, to:

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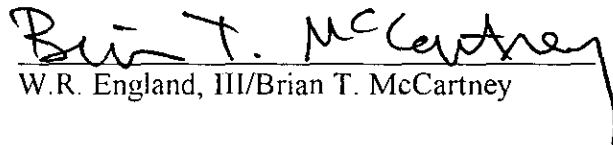
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