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September 20, 1999

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

FILED<sup>2</sup>

SEP 20 1999

Missouri Public  
Service Commission


Re: Case No. TO-2000-16

Dear Mr. Roberts:

Enclosed for filing with the Missouri Public Service Commission, please find an original and fourteen (14) copies of the Response of the Small Telephone Company Group to AT&T Communications of the Southwest Inc.'s Verified Report and Request for Evidentiary Hearing.

Please see that this filing is brought to the attention of the appropriate Commission personnel. If there are any questions regarding this filing, please feel free to give me a call at your convenience. Otherwise, I thank you in advance for your cooperation in this matter.

Sincerely,



W.R. England, III

WRE/da  
Enclosure  
cc: Parties of Record

BEFORE THE PUBLIC SERVICE COMMISSION  
OF THE STATE OF MISSOURI

FILED<sup>2</sup>

SEP 20 1999

Missouri Public  
Service Commission

In the matter of the Motion to Establish a )  
Docket Investigating the IntraLATA Toll )  
Service Provisioning Practices of Missouri )  
Interexchange Carriers, Public Utility or )  
Common Carrier Duties of Interexchange )  
Carriers, Motion to Show Cause, Request for )  
Emergency Hearing, and Alternative Petition )  
for Suspension and Modification. )

Case No. TO-2000-16

**Response of the Small Telephone Company Group**  
**to AT&T Communications of the Southwest Inc.'s Verified Report**  
**and Request for Evidentiary Hearing**

Comes now the Small Telephone Company Group (STCG)<sup>1</sup> and for its Response to  
AT&T Communications of the Southwest Inc.'s (AT&T) Verified Report states to the Missouri  
Public Service Commission (Commission) as follows:

1. On August 10, 1999, the Commission issued an Order Directing Notice, Directing  
Reports, and Requiring Record Collection in which it, among other things, directed AT&T to file  
a verified report stating, by exchange, the number of requests for 1+ intraLATA service it has  
received, the number it has accepted, and the number it has declined. In addition, the  
Commission permitted parties to file responses to the verified report no later than September 20,  
1999. Accordingly, the STCG takes this opportunity to submit the following response to  
AT&T's verified report filed on or about September 8, 1999. In addition, the STCG requests an  
evidentiary hearing on the relevancy and accuracy of the information purported to be presented  
in that verified report.

2. In AT&T's verified report, there is information that appears to be responsive to the

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<sup>1</sup>Members of the STCG are listed on Exhibit 1 attached hereto.

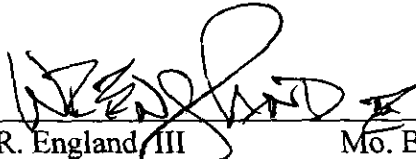
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Commission's directive. However, without further examination it is difficult to say whether that information is, in fact, responsive to the Commission's request and, more importantly, whether that information is, indeed, accurate. For example, for the vast majority of exchanges served by the STCG member companies, the verified report appears to indicate that AT&T has not accepted any 1+ intraLATA orders. Discussions with representatives of the various STCG member companies, however, indicate that that is not the case and that, in fact, AT&T sales representatives have initially accepted a number of 1+ intraLATA presubscription orders from the STCG members companies. Because of the short period of time within which to respond to the verified report, the STCG was not able canvas its members to obtain the number of customers of STCG member companies who had been told by AT&T service representatives that they will receive 1+ intraLATA toll service. At the very least, AT&T's verified report, on its face, does not square with experience of the STCG member companies.

3. In order for the Commission to obtain an accurate understanding of the information presented by AT&T in its verified report, it is necessary to conduct an evidentiary hearing regarding this issue. In addition, the Commission needs to conduct an evidentiary hearing to determine whether AT&T's refusal to offer 1+ intraLATA toll service in the state to exchanges served by STCG members companies, while such service is offered to customers of other large local exchange companies (such as Southwestern Bell Telephone Company, GTE and Sprint), is discriminatory and in violation of the Public Service Commission Law. At any such hearing, it is incumbent on AT&T to demonstrate by clear and convincing evidence that its discriminatory conduct is not undue or unjust and that it is in the public interest and consistent with the Public Service Commission Law.

WHEREFORE, in light of the foregoing, the STCG submits its response to AT&T's verified report and requests the Commission to establish an evidentiary hearing to further examine the information presented by AT&T.

Respectfully submitted,

  
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Attorneys for STCG

Certificate of Service

I hereby certify that copies of the foregoing have been mailed or hand-delivered to all counsel of record as shown on the attached service list this 20 day of September, 1999.

  
\_\_\_\_\_

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**SMALL TELEPHONE COMPANY GROUP (STCG)**

Alltel Missouri Inc.  
BPS Telephone Company  
Cass County Telephone Company  
Citizens Telephone Company of Higginsville, Missouri, Inc.  
Craw-Kan Telephone Cooperative, Inc.  
Ellington Telephone Company  
Farber Telephone Company  
Goodman Telephone Company, Inc.  
Granby Telephone Company  
Grand River Mutual Telephone Corporation  
Green Hills Telephone Corp.  
Holway Telephone Company  
Iamo Telephone Company  
Kingdom Telephone Company  
KLM Telephone Company  
Lathrop Telephone Company  
Le-Ru Telephone Company  
Mark Twain Rural Telephone Company  
McDonald County Telephone Company  
Miller Telephone Company  
New Florence Telephone Company  
New London Telephone Company  
Orchard Farm Telephone Company  
Oregon Farmers Mutual Telephone Co.  
Ozark Telephone Company  
Rock Port Telephone Company  
Seneca Telephone Company  
Steelville Telephone Exchange, Inc.  
Stoutland Telephone Company

**Exhibit 1**