

BEFORE THE MISSOURI PUBLIC SERVICE COMMISSION

In Re the Matter of Teleconnect Long)	
Distance Services and Systems Company)	
a MCI WorldCom Company d/b/a TelecomUSA,)	Case No. XT-2004-0617
Proposed Tariff to Increase its Intrastate)	Tariff File No. JX-2004-1436
Connection Fee to Recover Access Costs)	
Charged by Local Telephone Companies.)	

**TELECONNECT LONG DISTANCE SERVICES AND SYSTEMS CO.'S
RESPONSE TO PUBLIC COUNSEL'S MOTION FOR REHEARING**

COMES NOW Teleconnect Long Distance Services and Systems Co. (Teleconnect), and for its Response to Public Counsel's Motion for Rehearing states as follows:

1. Public Counsel by and large simply reiterates the arguments it has previously presented in this matter. Rather than burden the record even more by duplicating prior responses, Teleconnect simply incorporates by reference its prior responsive pleadings and oral arguments. Public Counsel makes a reference to lifeline and linkup programs that was not discussed in its motion to suspend, but it is neither a new issue nor on point. These are voluntary local service programs, not long distance service programs. And Teleconnect does not participate in these programs in Missouri. Plus, local customers are not required to subscribe to Teleconnect's long distance services and, therefore, can choose whether or not they want such services at the applicable rates including the already existing surcharge. In any event, this subject was addressed in the prior proceedings regarding these surcharges, in that AT&T (TT-2002-0129) provided an express exemption and Sprint (TT-2002-1136) and MCI (XT-2003-0047) did not. There is no change in this regard in the tariffs at issue, as they simply make a slight increase in the existing surcharge. Hence, Public Council has not raised any issue that requires additional attention or rehearing.

2. The Commission fully considered Public Counsel's arguments, as made evident in the Commission's orders. Public Counsel has not provided any sufficient reason for a rehearing and, therefore, has not complied with Section 386.500 RSMo. and 4 CSR 240-2.160.

3. Accordingly, the Commission should deny Public Counsel's Motion for Rehearing.

WHEREFORE, Teleconnect requests the Commission to deny Public Counsel's Motion for Rehearing.

Respectfully submitted,

CURTIS, HEINZ,
GARRETT & O'KEEFE, P.C.

/s/ Carl J. Lumley

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CERTIFICATE OF SERVICE

I hereby certify a true and correct copy of the above and foregoing document was sent via e-mail or U.S. Mail on the 4th day of August, 2004 to the following:

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