

**BEFORE THE MISSOURI PUBLIC SERVICE COMMISSION**

In the Matter of the Access Rates Charged )  
by Competitive Local Exchange ) Case No. TR-2001-65  
Telecommunications Companies in the )  
State of Missouri )

**SPRINT'S RESPONSE TO AT&T'S  
MOTION TO SUSPEND PROCEDURAL SCHEDULE PENDING RESOLUTION  
OF DISPUTE OVER ACCESS TO COST STUDIES**

COMES NOW Sprint Missouri, Inc. and Sprint Communications Company, L.P. (hereafter referred to collectively as "Sprint") and hereby submits its response to, and support of, AT&T's Motion to Suspend Procedural Schedule Pending Resolution of Dispute Over Access To Cost Studies.

1. On August 8, 2000, the Commission established this case to "investigate all of the issues affecting exchange access service, including particularly the actual costs incurred in providing such service, in order to establish a long-term solution which will result in just and reasonable rates for this service."<sup>1</sup> The Commission granted a clarification to the scope of this case on December 12, 2001 where it committed the question regarding a forward-looking cost study to the discretion of the Staff.

2. The Commission took further action in this case on March 14, 2002 where it established a procedural schedule and clarified the scope of this proceeding, amongst other actions. Specific to the procedural schedule, Staff was to formally file its finalized cost studies in this case by June 1, 2002 and direct testimony is to be filed by July 1, 2002.

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<sup>1</sup> Order Establishing Case, Case No, TR-2001-65, issued August 8, 2001.

3. AT&T filed a motion seeking a modification to the Commission's standard protective order on May 3, 2002. Subsequently, several parties have filed multiple response for and against AT&T's motion. To date, the Commission has not ruled on AT&T's May 3, 2002 motion.

4. On June 11, 2002, AT&T filed its Motion to Suspend Procedural Schedule Pending Resolution of Dispute Over Access to Cost Studies. In its Motion, AT&T states that a lack of access to highly confidential information contained within the various cost studies filed by Staff on June 1, 2002, has prohibited AT&T from reviewing such cost studies. AT&T claims it cannot even look at its own cost studies because highly confidential data from other companies is embedded within the cost studies. For these and other reasons, AT&T requests the current procedural schedule be suspended until the Commission resolves the outstanding motion regarding the protective order and AT&T has adequate time to review the cost studies.

5. Sprint supports AT&T's motion to suspend the current procedural schedule as it is a prudent and reasonable request given the fact that AT&T's internal experts have not been allowed access to critical information. While Sprint has access to its own data, Sprint's internal experts do not have access to any other cost studies. Consequently, Sprint cannot ascertain the reasonableness or comparability of other companies' cost studies. Given the fact that different cost models were used for different companies and assumptions and inputs developed for other companies could have a direct impact to the Sprint cost study, full access is required.

6. Sprint recognizes that this case has been underway for some time; however, Sprint believes that AT&T's request to suspend the current procedural schedule will have minimal, if any, negative consequences. In its March 14, 2002 Order, the Commission noted that "this case derives from an earlier case which established an interim cap on CLEC access rates. An express

purpose of this case is to gather the information necessary to replace the interim cap with a permanent solution.” As so much as this case is intended to benefit CLECs, AT&T appears to be the only CLEC actively participating.

WHEREFORE, for the reasons stated herein, Sprint supports the motion of AT&T and respectfully requests the Commission suspend the current procedural schedule.

Respectfully submitted,  
**Sprint**

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a copy of the above and foregoing was mailed, postage prepaid, to the parties listed below, this 18 day of June, 2002.

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