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January 22, 1999

FILED

JAN 22 1999 *nh*

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

Missouri Public
Service Commission

Re: Application of Southwestern Bell Telephone Company to
Provide Notice of Intent to File an Application for
Authorization to Provide In-Region InterLATA Services
Originating in Missouri Pursuant to Section 271 of the
Telecommunications Act of 1966 - Case No. TO-99-227

Dear Mr. Roberts:

Enclosed please find for filing the original plus 14 copies of
the Response of Digital Teleport, Inc., to Southwestern Bell's
Interconnection Survey Data Request in the above-captioned matter.

Very truly yours,

HENDREN AND ANDRAE, L.L.C.

Richard S. Brownlee III
Richard S. Brownlee, III

RSB/s

Enclosures

cc: Counsel of Record
Office of the Public Counsel
Richard Weinstein

FILED

JAN 22 1999

Missouri Public
Service Commission

**BEFORE THE PUBLIC SERVICE COMMISSION
STATE OF MISSOURI**

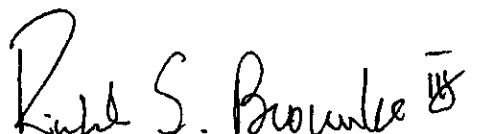
Application of Southwestern Bell)
Telephone Company to Provide Notice of)
Intent to File an Application for)
Authorization to Provide In-Region) Case No. TO-99-227
InterLATA Services Originating in Missouri)
Pursuant to Section 271 of the)
Telecommunications Act of 1966.)

**RESPONSE OF DIGITAL TELEPORT, INC. TO SOUTHWESTERN BELL
INTERCONNECTION SURVEY DATA REQUESTS**

COMES NOW Digital Teleport, Inc. by Hendren and Andrae, L.L.C., Richard S.
Brownlee, III and files its Response to Southwestern Bell's Interconnection Survey Data
Requests. (See Attachment)

Respectfully submitted,

HENDREN AND ANDRAE, L.L.C.



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**DATA REQUESTS TO ALL MISSOURI COMPANIES WITH A
SWBT INTERCONNECTION AGREEMENT**

Question 1: Your Company has an interconnection agreement with SWBT:

- a) Is the agreement for resale only, unbundled elements only or both?
- b) Has your Company requested resale services from SWBT? If not, when do you expect to make such a request?
- c) Has your Company requested unbundled network elements from SWBT? If not, when do you expect to make such a request?

Response: Our Company has an interconnection agreement with SWBT:

- a) The agreement is for both resale and unbundled elements.
- b) The Company has not requested resale service from SWBT. We expect to make such a request should we need to supplement our facilities-based services. We have no definite time period in which such a request may be made.
- c) The Company has and obtained access to conduits owned or controlled by SWBT; 911 and E911 services; directory assistance services to allow customers to obtain telephone numbers; operator call completion services; white pages directory listings; telephone numbers for assignment; and access to databases and associated signaling for call routing and completion.

Question 2: Has SWBT provided interconnection as required by Sections 251(c)(2) and 252(d)(1) of the Act, pursuant to Section 271(c)(2)(B)(i)?

Response: SWBT has entered into an agreement which states that it will provide interconnection as required by Sections 251(c)(2) and 252(d)(1) of the Act, pursuant to Section 271(c)(2)(B)(i).

Question 3: Has SWBT provided nondiscriminatory access to network elements as required by Section 251(c)(3) and 252(d)(1) of the Act, pursuant to Section 271(c)(2)(B)(ii)?

Response: SWBT has provided non-discriminatory access to certain network elements as required by the Act.

Question 4: Has SWBT provided nondiscriminatory access to the poles, ducts, conduits and right-of-way owned or controlled by SWBT at just and reasonable rates as required by Section 224 of the Communications Act of 1934, as amended by the Act (of 1996), pursuant to Section 271(c)(2)(B)(iii)?

Response: SWBT has provided the Company access to SWBT conduits.

Question 5: Has SWBT unbundled the local loop transmission between the central office and the customer's premises from local switching or other services, pursuant to Section 271(c)(2)(B)(iv) of the Act?

Response: Under the terms of the Agreement, SWBT has agreed to unbundle the local loop transmission between the central office and the customer's premises from local switching or other services, but no such unbundled local loop transmission has been provided to the Company.

Question 6: Has SWBT unbundled the local transport on the trunk side of a wireline local exchange carrier switch from switching or other services, pursuant to Section 271(c)(2)(B)(v) of the Act?

Response: Under the terms of the Agreement, SWBT has agreed to unbundle the local transport on the trunk site of a wireline local exchange carrier switch from switching or other services, but no such unbundled local transport has been provided to the Company.

Question 7: Has SWBT provided unbundled local switching from transport, local loop transmission, or other services, pursuant to Section 271(c)(2)(B)(vi) of the Act?

Response: No. Under the terms of the Agreement, SWBT has agreed to unbundle local switching from transport, local loop transmission or other services, but no unbundled local switching from transport, local loop transmission or other services has been provided the Company.

Question 8: Has SWBT provided nondiscriminatory access to the following, pursuant to section 271(c)(2)(B)(vii) of the Act:

- (a) 911 and E911 services;
- (b) directory assistance services to allow the other telecommunications carrier's customers to obtain telephone numbers; and,
- (c) operator call completion services?

Response: SWBT has provided nondiscriminatory access to the following:

- (a) 911 and E911 services.
- (b) directory assistance services to allow customers to obtain telephone numbers; and,
- (c) operator call completion services.

Question 9: Has SWBT provided white pages directory listings for customers of other telecommunications carrier's telephone exchange service, pursuant to Section 271(c)(2)(B)(viii) of the Act?

Response: SWBT has provided white pages directory listings for customers of other telecommunications carrier's telephone exchange service.

Question 10: Has SWBT provided nondiscriminatory access to telephone numbers for assignment to the other telecommunications carrier's telephone exchange service customers, pursuant to Section 271(c)(2)(B)(ix) of the Act?

Response: SWBT has provided nondiscriminatory access to telephone numbers for assignment to the other telecommunications carrier's telephone exchange service customers.

Question 11: Has SWBT provided nondiscriminatory access to databases and associated signaling necessary for call routing and completion, pursuant to Section 271(c)(2)(B)(x)?

Response: SWBT has provided nondiscriminatory access to databases and associated signaling necessary for call routing and completion.

Question 12: Has SWBT provided number portability, pursuant to Section 271(c)(2)(B)(xi) of the Act?

Response: No. Under the terms of the Agreement, SWBT has agreed to provide number portability, but has not provided it to the Company.

Question 13: Has SWBT provided nondiscriminatory access to such services or information as are necessary to allow the requesting carrier to implement local dialing parity as required by Section 251(b)(3) of the Act, pursuant to Section 271(c)(2)(B)(xii)?

Response: No.

Question 14: Has SWBT provided reciprocal compensation arrangements as required by Section 252(d)(2) of the Act, pursuant to Section 271(c)(2)(B)(xiii)?

Response: The terms of the Agreement provide for reciprocal compensation arrangements for termination of local traffic, for transit traffic, and for termination of intraLata interexchange traffic.

Question 15: Has SWBT provided telecommunications services available for resale as required by Sections 252(c)(4) and 252(d)(3) of the Act, pursuant to Section 271(c)(2)(B)(xiv)?

Response: No. Under the terms of the Agreement, SWBT has agreed to provide telecommunications services available for resale as required by Sections 252(c)(4) and 252(d)(3) of the Act, but has not provided such services to the Company.

Question 16: Please provide an exchange-specific list of the access lines, separated by resale and unbundled network elements, your Company is currently providing to end user customers for local service.

Response: The Company does not currently provide any resale of SWBT services or use unbundled network elements of SWBT to provide access line service to an end user customer for local service.

Question 17: For any network elements in questions 4 through 15 that your Company does not currently receive from SWBT, please provide your projections of when your Company expects to request such network elements.

Response: The Company does not receive the below listed network elements identified in 5, 6, 7, 12, 13, 14, and 15. The Company has no specific time projections when the Company expects to request any of the following elements:

- 5 Local loop transmission between the central office
 and the customer's premises**
- 6 Local transport on the trunk side of wireline LEC switch**
- 7 Unbundled local switching**
- 12 Number portability**
- 13 Local dialing parity**
- 14 Reciprocal compensation**
- 15 Resale**

Question 18: Is there any additional information concerning SWBT's provision of resale and/or unbundled network elements that you believe the Commission should consider when making its recommendation to the FCC concerning SWBT's application for Section 271 approval?

Response: No.

Question 19: Is there any agreement, condition of interconnection or other arrangement between your Company and SWBT or any other company that would limit, restrict, or preclude any accurate answers to the above questions?

Response: No.