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July 27, 2001

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FILED³

JUL 27 2001

Missouri Public
Service Commission

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

RE: Case No. TO-2001-467

Dear Mr. Roberts:

Enclosed for filing in the above-captioned case are an original and eight (8) conformed copies of **STAFF'S MOTION TO COMPEL DISCOVERY AND FOR WAIVER**.

This filing has been mailed or hand-delivered this date to all counsel of record.

Thank you for your attention to this matter.

Sincerely yours,

Wm K Haas

William K. Haas
Deputy General Counsel
(573) 751-7510
(573) 751-9285 (Fax)

WKH:sw
Enclosure
cc: Counsel of Record

BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI

FILED³
JUL 27 2001

Missouri Public
Service Commission

In the Matter of the Investigation of the)
State of Competition in the Exchanges of)
Southwestern Bell Telephone Company.)

Case No. TO-2001-467

STAFF'S MOTION TO COMPEL DISCOVERY AND FOR WAIVER

COMES NOW the Staff of the Missouri Public Service Commission and for its motion states:

1. On March 13, 2001, the Missouri Public Service Commission issued an Order which established this case for the purpose of investigating the state of competition in Southwestern Bell Telephone Company (SWBT) exchanges in accordance with § 392.245 RSMo 2000. The Order also made parties of SWBT and seventy (70) alternative local exchange telecommunications companies (ALECs) without the need for intervention.

2. On June 28, 2001, the Commission issued an Order that adopted a procedural schedule that included direct testimony by SWBT on June 28, 2001, rebuttal testimony on August 9, 2001, and a hearing for September 24-28, 2001.

3. On June 13, 2001, the Staff simultaneously delivered Data Information Request (DR) No. 2501 to the seventy (70) ALECs made parties to this case. A copy of the data request is attached as Appendix A.

4. Staff DR No. 2501 asks:

Please use the attached form to supply the number of voice grade equivalent access lines in each SWBT Missouri exchange in which you offer local exchange

service. Please provide the quantity of voice grade equivalent access lines for pure resale, UNE Loop, UNE-P, and full facility based lines in each exchange. Provide data for both residential and business end customers. Also, please provide the date on which you first began providing business and residential service in each exchange. This data request may be downloaded from the Missouri Public Service Commission's Web site at <http://www.psc.state.mo.us/telecommunications-dr.asp>.

5. Commission Rule 4 CSR 240-2.090(2) provides, in part:

Parties may use data requests as a means for discovery. The party to whom data requests are presented shall answer the requests within twenty (20) days after receipt unless otherwise agreed by the parties to the data requests. If the recipient objects to data requests or is unable to answer within twenty (20) days, the recipient shall serve all of its objections or reasons for its inability to answer in writing upon the requesting party within ten (10) days after receipt of the data requests, unless otherwise ordered by the commission.

6. Only 18 of the ALECs have now satisfactorily responded to the data request.

7. Allegiance Telecom of Missouri (Allegiance) reported all lines as pure resale.

The Staff disagrees with Allegiance's explanation that it cannot distinguish between its customers receiving resold service and those receiving UNE-Loop service. When Allegiance submits an order to SWBT, it is required by SWBT to submit the order as a resold line or a UNE Loop.

8. XO Missouri, Inc. (XO), alone, objected to Staff DR No. 2501. XO objected that the data request was overbroad and burdensome. Following discussions with Staff, XO answered the data request.

9. Fifty-one other ALECs have failed to answer the data request. Those 51 companies are listed on Appendix B.

10. The information requested by Staff DR 2501 is relevant. Section 392.245.5 RSMo provides, in part:

Each telecommunications service of an incumbent local exchange telecommunications company shall be classified as competitive in any exchange

in which at least one alternative local exchange telecommunications company has been certified under section 392.455 and has provided basic local telecommunications service in that exchange for at least five years, unless the commission determines, after notice and a hearing, that effective competition does not exist in the exchange for such service.

The number of access lines by exchange is relevant because the statute requires an exchange-by-exchange investigation. The breakdown between residential and business lines is relevant because the statute requires a service-by-service investigation. The breakdown between pure resale, UNE Loop, UNE-P, and full facility-based lines is relevant so that the Commission may determine the extent to which ALECs have utilized the various modes of market entry to penetrate SWBT's local exchange markets in Missouri. Finally, the date upon which an ALEC began service is relevant to the development and extent of competition in an exchange.

11. It is not burdensome for an ALEC to provide this information exchange-by-exchange. The geographic area in which an ALEC offers service must follow the exchange boundaries of the incumbent local exchange company (here SWBT) and be no smaller than an exchange. See, § 392.455(3) RSMo 2000. Moreover, Section 392.450.2(1) RSMo requires ALECs to file and maintain tariffs with the Commission in the same manner and form as the Commission requires of the incumbent local exchange company (again, SWBT). These ALECs' tariffs state that they provide service within SWBT's exchanges. For example, Sheet 21 of 1-800-Reconex's basic local telecommunications tariff lists out the SWBT exchanges to describe its service areas. Central office codes (also known as NXXs or prefixes), the second three digits in a ten digit telephone number, are assigned to an exchange or to a rate center within an exchange. An ALEC can simply use the knowledge of its customers' NXXs to answer this data request, if it is not keeping records by exchange.

Following discussions with some ALECs, Staff learned that some ALECs were having difficulty sorting its customers by exchange. Although the Staff cannot accept that carriers do not

know in which exchanges their customers are located, in an effort to assist the ALECs, the Staff has posted on the Commission's Web site a listing of Missouri NPA NXXs which references all Missouri exchanges according to NPA NXX. Assuming, arguendo, that carriers do not know in which exchanges their customers are assigned, the Staff believes its listing of Missouri NPA NXXs can be utilized by ALECs to fully comply with Staff's Data Request No. 2501.

12. Commission Rule 4 CSR 240-2.090(8) provides:

Except when authorized by an order of the commission, the commission will not entertain any discovery motions, until the following requirements have been satisfied:

(A) Counsel for the moving party has in good faith conferred or attempted to confer by telephone or in person with opposing counsel concerning the matter prior to the filing of the motion. Merely writing a demand letter is not sufficient. Counsel for the moving party shall certify compliance with this rule in any discovery motion; and

(B) If the issues remain unresolved after the attorneys have conferred in person or by telephone, counsel shall arrange with the commission for an immediate telephone conference with the presiding officer and opposing counsel. No written discovery motion shall be filed until this telephone conference has been held.

13. Commission Rule 4 CSR 240-2.015 provides that a rule in this Chapter 2 may be waived by the Commission for good cause. Commission Rule 4 CSR 240-2.060(14) adds that an application for a waiver from a commission rule shall contain information as follows:

(A) Specific indication of the statute, rule or tariff from which the variance or waiver is sought;

(B) The reasons for the proposed variance or waiver and a complete justification setting out the good cause for granting the variance or waiver; and

(C) The name of any public utility affected by the variance or waiver.

14. The Staff requests a waiver of Commission Rule 4 CSR 240-2.090(8). The reasons for the proposed waiver and a complete justification setting out the good cause for the

waiver follow: Compliance with this rule would require Staff counsel to consult with opposing counsel for 52 ALECs. Forty-two of these ALECs are not represented by counsel in this proceeding. Compliance with this rule would then require the presiding officer to confer with Staff counsel and these opposing counsel. Furthermore, Data Request No. 2501 is not party-specific. It requests the same information in the same format from all 70 ALECs made parties to this case. A complete, as possible, tabulation of the extent of competition in SWBT's exchanges does not lend itself to the Staff conferring away some ALECs' duty to provide this information. A complete, as possible, tabulation of the extent of competition in SWBT's exchanges calls for a single ruling by the Commission compelling the remaining ALECs to answer Staff Data Request No. 2501. The ALECs named in Appendix B would be affected by the waiver.

WHEREFORE, the Staff requests the Commission to issue an order compelling the ALECs listed in Appendix B to fully answer Staff Data Request No. 2501, and granting a waiver of Commission Rule 4 CSR 240-2.090(8).

Respectfully submitted,

DANA K. JOYCE
General Counsel

Wm K Haas

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Missouri Bar No. 28701

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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 27th day of July 2001.

Wm K Haas

MOPSC Data Request - TO-2001-467

Tariffed Name:

Exchange	RESIDENTIAL					BUSINESS				
	VOICE GRADE EQUIVALENT LINES					VOICE GRADE EQUIVALENT LINES				
	Pure resale	UNE loop	UNE P	Full facilities based	Date first provided local exchange telecommunications service	Pure resale	UNE loop	UNE P	Full facilities based	Date first provided local exchange telecommunications service
ADRIAN										
ADVANCE										
AGENCY										
ALTEBGFRHN										
ANTONIA										
ARCHIE										
ARGYLE										
ARMSTRONG										
ASH GROVE										
BEAUFORT										
BELL CITY										
BELTON										
BENTON										
BILLINGS										
BISMARCK										
BLOOMFIELD										
BLOOMSDALE										
BLUE SPG										
BONNETERRE										
BOONVILLE										
BOWLNGGREN										
BRIDGETON										
BROOKFIELD										
CAMDENTON										
CAMPBELL										
CAPEGIRARD										
CARDWELL										

Exchange	RESIDENTIAL					BUSINESS				
	VOICE GRADE EQUIVALENT LINES					VOICE GRADE EQUIVALENT LINES				
	Pure resale	UNE loop	UNE P	Full facilities based	Date first provided local exchange telecommunications service	Pure resale	UNE loop	UNE P	Full facilities based	Date first provided local exchange telecommunications service
CARL JCT										
CARROLLTON										
CARTHAGE										
CARUTHRSVL										
CEDAR HILL										
CENTER										
CHAFFEE										
CHARLESTON										
CHESTERFLD										
CHILICOTH										
CLARKSVL										
CLEVER										
CLIMAX SPG										
CREVECOEUR										
DE KALB										
DE SOTO										
DEERING										
DELTA										
DEXTER										
DOWNING										
E PRAIRIE										
EDINA										
EINDEPNDNC										
ELDON										
ELSBERRY										
ESSEX										
EUREKA										
EXCELSRSPG										
FAIR GROVE										
FARLEY										
FARMINGTON										

Exchange	RESIDENTIAL					BUSINESS				
	VOICE GRADE EQUIVALENT LINES					VOICE GRADE EQUIVALENT LINES				
	Pure resale	UNE loop	UNE P	Full facilities based	Date first provided local exchange telecommunications service	Pure resale	UNE loop	UNE P	Full facilities based	Date first provided local exchange telecommunications service
FAYETTE										
FENTON										
FERGUSON										
FISK										
FLAT RIVER										
FLORISSANT										
FRANKFORD										
FREDERCKTN										
FREEBURG										
FSSCRSTLCY										
FULTON										
GIDEON										
GLADSTONE										
GLASGOW										
GRAIN VLY										
GRAVOIS ML										
GRAYSUMMIT										
GREENWOOD										
HANNIBAL										
HARVESTER										
HAYTI										
HERCUMPLY										
HIGBEE										
HIGH RIDGE										
HILLSBORO										
HOLCOMB										
HOMERSVILLE										
IMPERIAL										
INDEPNDNCE										
JACKSON										
JASPER										

Exchange	RESIDENTIAL					BUSINESS				
	VOICE GRADE EQUIVALENT LINES					VOICE GRADE EQUIVALENT LINES				
	Pure resale	UNE loop	UNE P	Full facilities based	Date first provided local exchange telecommunications service	Pure resale	UNE loop	UNE P	Full facilities based	Date first provided local exchange telecommunications service
JOPLIN										
KANSASCITY										
KENNETT										
KIRKSVILLE										
KIRKWOOD										
KNOBNOSTER										
LA MONTE										
LADUE										
LAMAR										
LANCASTER										
LEADWOOD										
LEESSUMMIT										
LIBERTY										
LILBOURN										
LINN										
LKOZKOSBCH										
LOCKWOOD										
LOUISIANA										
MACKSCREEK										
MALDEN										
MANCHESTER										
MARBLEHILL										
MARCELINE										
MARIONVL										
MARSHALL										
MARSTON										
MAXVILLE										
MEHLVILLE										
META										
MEXICO										
MOBERLY										

Exchange	RESIDENTIAL					BUSINESS				
	VOICE GRADE EQUIVALENT LINES					VOICE GRADE EQUIVALENT LINES				
	Pure resale	UNE loop	UNE P	Full facilities based	Date first provided local exchange telecommunications service	Pure resale	UNE loop	UNE P	Full facilities based	Date first provided local exchange telecommunications service
MONETT										
MONTGORYCY										
MOREHOUSE										
NASHUA										
NEOSHO										
NEVADA										
NEW MADRID										
NEWFRNKLIN										
NIXA										
OAK RIDGE										
OAKVILLE										
OLDAPPLETN										
ORAN										
OSAGE BEACH										
OVERLAND										
PACIFIC										
PARKVILLE										
PATTON										
PAYNESVL										
PERRYVILLE										
PIERCECITY										
POCAHONTAS										
POND										
POPLAR BLF										
PORTAGEVL										
PORTAGSIUX										
PUXICO										
QULIN										
RAYTOWN										
REPUBLIC										
RICHMOND										

Exchange	RESIDENTIAL					BUSINESS				
	VOICE GRADE EQUIVALENT LINES					VOICE GRADE EQUIVALENT LINES				
	Pure resale	UNE loop	UNE P	Full facilities based	Date first provided local exchange telecommunications service	Pure resale	UNE loop	UNE P	Full facilities based	Date first provided local exchange telecommunications service
RICHWOODS										
RISCO										
RIVERVIEW										
ROGERSVL										
RUSHVILLE										
SANANTONIO										
SAPPINGTON										
SCOTT CITY										
SEDALIA										
SENATH										
SIKESTON										
SLATER										
SOKANSASCY										
SOUTHVILLE										
SPANISH LAKE										
SPRINGFLD										
ST CHARLES										
ST CLAIR										
ST JOSEPH										
ST LOUIS										
ST MARYS										
STANBERRY										
STEGNVIEVE										
STRAFFORD										
TIFFANYSPG										
TRENTON										
TUSCUMBIA										
UNION										
VALLEYPARK										
VERSAILLES										
VIENNA										

Exchange	RESIDENTIAL					BUSINESS				
	VOICE GRADE EQUIVALENT LINES					VOICE GRADE EQUIVALENT LINES				
	Pure resale	UNE loop	UNE P	Full facilities based	Date first provided local exchange telecommunications service	Pure resale	UNE loop	UNE P	Full facilities based	Date first provided local exchange telecommunications service
WALNUT GRV										
WARDELL										
WARE										
WASHINGTON										
WEBB CITY										
WEBSTER GROVES										
WELLSVILLE										
WESTPHALIA										
WILLARD										
WYATT										

MoPSC Staff Data Request Instructions

Instructions for completing the attached Local Competition Data Request Form.

I. BACKGROUND

In accordance with Subsection 392.245.5 RSMo 2000, the Missouri Public Service Commission has established Case No. TO-2001-467 for the purpose of investigating "the state of competition in each exchange where an alternative local exchange telecommunications company (ALEC) has been certified to provide local exchange telecommunications service" in Missouri. Case No. TO-2001-467 involves competition only in exchanges served by Southwestern Bell Telephone Company (SWBT). Case No. TO-2001-467 does not involve an analysis of competition in Sprint or Verizon exchanges. It is expected that competition in Sprint and Verizon exchanges will be analyzed in future proceedings. Pursuant to its March 13, 2001 *Order Establishing Case, Directing Notice, Joining Parties, and Granting Protective Order*, all competitive local exchange carriers with approved tariffs offering service in SWBT's Missouri service area as of March 1, 2001 have been made parties to Case No. TO-2001-467 without the need for intervention.

II. PURPOSE

The purpose of this data request is to ascertain on an exchange specific basis, the number of voice-grade equivalent competitive access lines in service in each SWBT exchange in Missouri, and to determine the date that individual competitors first began to provide local exchange service in each SWBT exchange. Information is sought for residential and business voice-grade equivalent access lines. Information gained on a company-specific basis will be kept confidential. Staff is requesting all competitive local exchange carriers in Missouri to report the number of voice-grade equivalent access lines on an exchange-by-exchange basis. Staff is requesting line count data as of May 1, 2001.

III. DIFFERENCES IN STAFF'S DATA REQUEST AND FCC FORM 477

Some of the data sought by the Staff is consistent with information reported on FCC Form 477, although there are considerable differences. For example, Part II of FCC Form 477 contains a variance for companies providing fewer than 10,000 voice-grade equivalent lines. There are no variances for "small" carriers in the Staff's data request. All competitive local exchange carriers with MoPSC approved tariffs must respond to this data request, no matter how few customers are served. Another example of the difference in FCC Form 477 and the Staff's data request is that FCC Form 477 requests lines to be separated by 5-digit zip code. The Staff's data request requires lines be categorized only by exchange.

IV. HOW TO FILE A RESPONSE TO THIS DATA REQUEST

Please complete the electronic version of the form, which can be downloaded to your local drive from the Commission's website at the following address:
<http://www.psc.state.mo.us/telecommunications-dr.asp>. Once completed, please e-mail the form to dhake01@mail.state.mo.us no later than July 5, 2001.

V. WHO MUST RESPOND TO THIS DATA REQUEST?

All providers of competitive basic local exchange telecommunications service in Missouri. Each company possessing an approved tariff must respond under the appropriate tariff name. If your company possesses multiple fictitious names, a separate report is required for each fictitious name.

VI. WHAT IS MEANT BY "VOICE TELEPHONE SERVICE?"

Voice telephone service means local exchange or exchange access services that allow end users to originate and terminate local telephone calls on the public switched telephone network, whether used by the end user for voice telephone calls or for other types of calls carried over the public switched network (for example, lines used for facsimile equipment).

VII. WHAT IS MEANT BY "VOICE-GRADE" EQUIVALENT LINES?

Providers are to report voice-grade equivalent lines. Count as one voice-grade equivalent line: traditional analog POTs lines, Centrex-CO extensions, and Centrex-CU trunks. Count lines based on how they are charged to the customer rather than how they are physically provisioned. For example, count Basic Rate Integrated (BRI) Services Digital Network (ISDN) lines as two voice-grade equivalent lines. Report 8 voice-grade equivalent lines if a customer buys 8 trunks that happen to be provisioned over a DS1 circuit. If a customer buys a DS1 circuit that is provided as channelized service, report 24 voice-grade equivalent lines, even if there is some indication that the customer is only using 8 of the derived lines. Thus, a voice-grade equivalent line is a line that directly connects an end user to a carrier and allows the end user to originate and terminate local telephone calls on the public switched network. Voice-grade equivalent lines include high capacity lines that are channelized to provide voice-grade service.

Note for competitive LECs providing local exchange service over hybrid fiber-coaxial cable television systems: Count your records and report how many voice-grade equivalent lines are being billed for.

VIII. WHAT IS MEANT BY PURE RESALE VOICE GRADE EQUIVALENT LINES?

Pure resold lines are those lines provided pursuant to section 251(c)(4) of the Communications Act of 1934, as amended. Pure resold lines are those lines not owned or controlled by the telephone company billing the end user for the service. Pure resold lines are typically leased from an underlying carrier at a wholesale discount off the tariffed rate. The use of resold lines exclusively provides a means to offer service without owning

or controlling any equipment. Pure resold lines are those lines provided under a general or local exchange tariff, but without benefit of an accompanying switched access tariff.

IX. WHAT IS MEANT BY UNE LOOP VOICE GRADE EQUIVALENT LINES?

UNE loop lines are those lines where the competitor provides switching for the line. UNE loops are obtained on a stand-alone basis and service is provided to the end user without combining other UNEs. Service provisioned over UNE loops requires the competitor to lease a loop from SWBT to connect to the competitor's own switch. UNE loop lines are provided under a general or local exchange tariff in combination with a switched access tariff.

X. WHAT IS MEANT BY UNE P VOICE GRADE EQUIVALENT LINES?

UNE Platform lines are those lines utilizing a combination of UNEs. Service provisioned over UNE P lines does not require the competitor to use its own switch, port, or loop. UNE P lines are provided under a general or local exchange tariff in combination with a switched access tariff.

XI. WHAT IS MEANT BY FULL FACILITY BASED VOICE GRADE EQUIVALENT LINES?

Full facility based lines are those lines owned or controlled exclusively by a competitive local exchange carrier and used to connect to an end user's premises. Count as your own such facilities, those facilities that you actually owned as well as facilities such as dark fiber that you obtained the right to use from other entities. Do not include, as full facilities based lines, lines provided over UNE loops that you obtained from another carrier. Full facility based lines are provided under a general or local exchange tariff in conjunction with a switched access tariff.

APPENDIX B

1-800-Reconnex, Inc.

2nd Century Communications, Inc.

AccuTel of Texas, Inc.

Adelphia Business Solutions

Allegiance Telecom of Missouri¹

American Communications Services of K.C., Inc.

BarTel Communications, Inc.

Birch Telecom of Missouri, Inc.

Brooks Fiber Communications of Missouri, Inc.

Buy-Tel Communications, Inc.

Camarato Distributing, Inc.

Central Missouri Telecommunications, Inc.

Cierra Network Systems, Inc.

The Cube

Delta Phones, Inc.

DMJ Communications, Inc.

Gabriel Communications of Missouri, Inc. (now NuVox)

Global Crossing Local Services

Global Crossing Telemanagement, Inc.

HJN Telecom, Inc.

LDD, Inc.

Logix Communications Corporation

Maxcom, Inc.

¹ See paragraph 7 of Staff's Motion.

Max-Tel Communications, Inc.

McLeodUSA

MCImetro Access Transmission Services, LLC

MCI Worldcom Communications, Inc.

Missouri Telecom, Inc.

Mpower Communications Corp.

Net-Tel Communications Corporation

NOW Communications, Inc.

Omniplex Communications Group

The Pager Company

Phones for All

Primary Network Communications (a/k/a Broadspan Communications, Inc., now Mpower Communications Central Corp.)

QCC, Inc.

Quick-Tel Communications

Quintelco, Inc.

Ren-Tel Communications

Simply Local Services, Inc.

Smoke Signal Communications

Snappy Phone

Southwest Teleconnect

TCG Kansas City

TCG St. Louis

Teligent, Inc.

Tel-Link

TransStar Communications

Universal Telephone

U.S. Telco, Inc.

Winstar Wireless, Inc.

WorkNet Communications, Inc.

**Service List for
Case No. TO-2001-467
Revised: July 27, 2001 (SW)**

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131 East High Street
Jefferson City, MO 65101**

1-800-Reconex, Inc.
(f/k/a Sterling International Funding, Inc.,
d/b/a Reconex)
P.O. Box 40
2500 Industrial Avenue
Hubbard, OR 97032

2nd Century Communications, Inc.
Suite 50
7702 Woodland Center Boulevard
Tampa, FL 33614

AccuTel of Texas, Inc.
7900 John W. Carpenter Freeway
Dallas, TX 75247

Adelphia Business Solutions Operations, Inc.
121 Champion Way
Canonsburg, PA 15317

Allegiance Telecom of Missouri
1950 Stemmons Freeway, Suite 3026
Dallas, TX 75207-3118

ALLTEL Communications, Inc.
One ALLIED Drive
P.O. Box 2177
Little Rock, AR 72203

American Communication Services of Kansas
City, Inc.
131 National Business Parkway,
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Annapolis Junction, MD 20701

AT&T Communications of the Southwest, Inc.
101 West McCarty, Suite 216
Jefferson City, MO 65101

BarTel Communications, Inc.
333 Leffingwell, Suite 101
St. Louis, MO 63122

Birch Telecom of Missouri, Inc.
2020 Baltimore Avenue
Kansas City, MO 64108

Brooks Fiber Communications of Missouri, Inc.
701 Brazos, Suite 600
Austin, TX 78701

BTI
(Business Telecom, Inc.)
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Raleigh, North Carolina 27609

Buy-Tel Communications, Inc.
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Colleyville, TX 76034

Camarato Distributing, Inc.
P.O. Box 638
Herrin, Illinois 62948

Central Missouri Telecommunications, Inc.
P.O. Box 596
Osage Beach, Missouri 65065

Ciera Network Systems, Inc.
2630 Fountainview, Suite 300
Houston, Texas 77057

Computer Business Sciences, Inc.
80-02 Kew Gardens Road, Suite 5000
Kew Gardens, NY 11415

The Cube
(Tin Can Communications Company, L.L.C.)
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Houston, TX 77005

Delta Phones, Inc.
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245 Illinois St.
Delhi, LA 71232

DMJ Communications, Inc.
2525 North Grandview, Suite 900
Odessa, TX 79761

dPi-Teleconnect, L.L.C.
2997 LBJ Freeway, Suite 225
Dallas, TX 75234

EZ Talk Communications, L.L.C.
4727 South Main
Stafford, TX 74777

Gabriel Communications of Missouri, Inc.
16090 Swingley Ridge Road
Chesterfield, MO 63017

Global Crossing Local Services, Inc.
(Formerly Frontier Local Services, Inc.)
2710 Executive Drive
Green Bay, WI 54307

Global Crossing Telemanagement, Inc.
(Formerly Frontier Telemanagement, Inc.)
2710 Executive Drive
Green Bay, WI 54307

HJN Telecom, Inc.
3235 Satellite Blvd. Building 400, Suite 300
Duluth, GA 30096

Intermedia Communications, Inc.
1 Intermedia Way
M.C. FLT-HQ3
Tampa, FL 33647-1752

Ionex Communications, Inc.
5710 LBJ Freeway, Suite 215
Dallas, TX 75240

KMC Telecom III, Inc.
3075 Breckinridge Blvd., Suite 415
Duluth, GA 30096

LDD, Inc.
24 South Minnesota
Cape Girardeau, Missouri 63702

Level 3 Communications, LLC
1450 Infinite Drive
Louisville, CO 80027

Logix Communications Corporation
(Formerly Dobson Wireless, Inc.)
14101 Wireless Way
Oklahoma City, OK 73134

Maxcom, Inc.
10647 Widmer Road
Lenexa, KS 66215

Max-Tel Communications, Inc.
P.O. Box 280
102 W. Franklin
Alvord, TX 76225

MCImetro Access Transmission Services, LLC
701 Brazos, Suite 600
Austin, TX 78701

Stephen F. Morris
MCI Worldcom Communications, Inc.
(Worldcom, Inc.)
701 Brazos, Suite 600
Austin, TX 78701

Bradley R. Kruse
McLeodUSA Telecommunications Services, Inc.
P. O. Box 3177
Cedar Rapids, IA 52406-3177

Missouri Comm South, Inc.
(Comm South Companies, Inc.)
2909 Buckner Blvd., Ste 800
Dallas, TX 75228

Missouri Telecom, Inc.
P.O. Box 419
515 Cleveland, Suite C
Monett, MO 65708

Mpower Communications Corp.
ATTN: Laurie Adamski
175 Sully's Trail, Suite 300
Pittsford, NY 14534

Navigator Telecommunications, L.L.C.
P.O. Box 13860
8525 Riverwood Park Drive
North Little Rock, AR 72113-0860

Net-Tel Communications Corporation
(Net-Tel Corporation)
1023 31st Street, NW
Washington, D.C. 20007

NOW Communications, Inc.
713 Country Place Drive
Jackson, MS 39208

Omniplex Communications Group, LLC
(Formerly USA eXchange, LLC)
17 Research Park Drive
St. Charles, MO 63304

The Pager Company
3030 East Truman Road
Kansas City, MO 64127

Payroll Advance
808 South Baker
Mountain Home, AR 72643

Phones for All
(Teléfonos Para Todos)
Preferred Carrier Services, Inc.
1425 Greenway, Suite 210
Irving, Texas 75038

Mpower Communications Central Corp.
175 Sully's Trail, Ste. 300
Pittsford, NY 14534

QCC, Inc.
(Formerly Quest Communications Corporation)
8829 Bond Street
Overland Park, KS 66214

Quick-Tel Communications, Inc.
P.O. Box 196
456 W Rock Island
Boyd, Texas 76023

Quintelco, Inc.
1 Blue Hill Plaza
Pearl River, NY 10965

Qwest Communications Corporation
(USLD Communications, Inc.)
4250 N. Fairfax Drive, 12W002
Arlington, VA 22203

Ren-Tel Communications, Inc.
7337 S. Mitchell Ct.
Villa Rica, GA 30180

Simply Local Services, Inc.
2225 Apollo Dr.
Fenton, MO 63026

Smoke Signal Communications
(Choctaw Communications, L.C.)
8400 South Gessner
Houston, Texas 77074

Snappy Phone
P.O. Box 29620
6901 West 70th Street
Shreveport, LA 71129

SouthWest TeleConnect
7000 Cameron Road, Suite 200
Austin, TX 78752-2828

Lisa Creighton Hendricks
Sprint Communications Company, L.P.
Mail Stop KSOPKJ0502
5454 West 110th Street
Overland Park, KS 66211

Suretel, Inc.
5 North McCormick
Oklahoma City, OK 73127

TCG Kansas City, Inc.
Teleport Communications Group
Two Teleport Drive
Staten Island, NY 10311

TCG St. Louis
Two Teleport Drive, Suite 300
Staten Island, NY 10311

Tel Com Plus
(United States Telecommunications, Inc.)
5251 110th Avenue, North, Suite 118
Clearwater, FL 33760-4837

Teligent, Inc.
8065 Leesburg Pike, Suite 400
Vienna, VA 22182

Tel-Link, L.L.C.
1001 Third Avenue West, Suite 354
Bradenton, FL 34205

TranStar Communications
P.O. Box 211807
Bedford, TX 76095

Universal Telephone
2405 E. Pawnee, Suite 10
Wichita, KS 67211-5455

U.S. Telco, Inc.
P.O. Box 606
Wilsonville, OR 97070

Winstar Wireless, Inc.
1615 L Street, NW, Suite 1260
Washington DC 20036

WorkNet Communications Inc.
7777 Bonhomme Avenue, Suite 2000
St. Louis, MO 63105

XO Missouri, Inc.
(f/k/a Nextlink Missouri, Inc.)
2020 Westport Center Drive
Maryland Heights, MO 63146