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Vice Chair

## Missouri Public Service Commission

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December 3, 1999

GORDON L. PERSINGER  
Acting Executive Director  
Director, Research and Public Affairs

WESS A. HENDERSON  
Director, Utility Operations

ROBERT SCHALLENBERG  
Director, Utility Services

DONNA M. KOLILIS  
Director, Administration

DALE HARDY ROBERTS  
Secretary/Chief Regulatory Law Judge

DANA K. JOYCE  
General Counsel

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

**RE: TO-2000-301**

Dear Mr. Roberts:

Enclosed for filing in the above-captioned case are an original and fourteen (14) conformed copies of a **MOTION TO FILE COMMISSION-ORDERED REPORT ON TESTING.**

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,

Keith R. Krueger  
Deputy General Counsel  
(573) 751-4140  
(573) 751-9285 (Fax)

KK/jb  
Enclosure  
cc: Counsel of Record

**FILED**

**DEC 3 1999**

Missouri Public  
Service Commission

BEFORE THE PUBLIC SERVICE COMMISSION  
OF THE STATE OF MISSOURI

FILED

DEC 3 1999

Missouri Public  
Service Commission

In the Matter of Sprint Missouri, Inc.'s )  
Request For Termination of Quarterly )  
4-Tel Tests )

Case No. TO-2000-301

**Motion to File Commission-Ordered Report on Testing**

COMES NOW the Staff of the Missouri Public Service Commission ("Staff"), and for its Motion to File Commission Ordered Report on Testing, states to the Missouri Public Service Commission ("Commission") as follows:

1. On August 13, 1993, the Staff, the Office of the Public Counsel ("OPC"), and United Telephone Company of Missouri, now known as Sprint, Missouri, Inc. ("Sprint") filed a Stipulation and Agreement Regarding Quality of Service in Case No. TR-93-181 ("the Stipulation"), by terms of which the parties agreed that Sprint would make quarterly tests of its equipment and submit the results of those tests to the Staff. The Commission subsequently ordered Sprint to perform the tests in accordance with the terms of the Stipulation. The Commission thereafter closed its file on Case No. TR-93-181.

2. On October 28, 1999, Sprint created this docket by filing a Request to Terminate Quarterly 4-TEL Wire Center Testing ("Request").

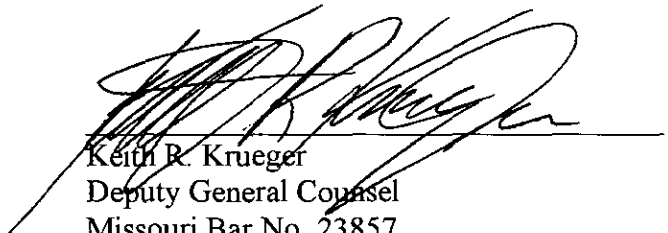
3. On November 3, 1999, the Commission issued its Order Directing Staff Report, in which it ordered the Staff to file a report in response to Sprint's Request.

4. The Staff has completed its investigation into the matter and has prepared its Staff Report, which it hereby offers for filing as directed in the November 3, 1999 Order Directing Staff Report.

**WHEREFORE**, the Staff respectfully requests that the Commission grant the Staff's Motion and accept for filing the attached Report.

Respectfully submitted,

DANA K. JOYCE  
General Counsel

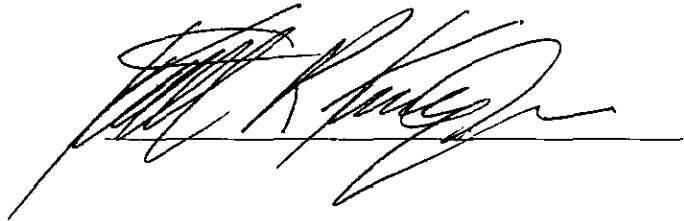


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### **Certificate of Service**

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 3rd day of December 1999.



**Service List for  
Case No. TO-2000-300  
December 3, 1999**

Office of the Public Counsel  
P.O. Box 7800  
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Ms. Linda K. Gardner  
Senior Attorney  
Sprint Missouri, Inc.  
5454 W. 110<sup>th</sup> St., 10<sup>th</sup> Floor  
Overland Park, KS 66211

**MISSOURI PUBLIC SERVICE COMMISSION  
STAFF REPORT ON TESTING**

**In the Matter of Sprint Missouri, Inc.'s  
Request for Termination of Quarterly 4-TEL Tests  
Case No. TO-2000-301**

**Prepared by  
Myron Couch**

**December 3, 1999**

On August 13, 1993, the Staff of the Missouri Public Service Commission ("Staff"), the Office of the Public Counsel ("OPC"), and United Telephone Company of Missouri, now known as Sprint Missouri, Inc. ("Sprint" or "Company") entered into a Stipulation in Case No. TR-93-181 ("the Stipulation"), which required the Company to make quarterly tests and submit the results of those tests to Staff.

The Company agreed to perform a routine of tests at each of its Missouri step-by-step central offices each quarter. The routine consisted of testing the local switch and its trunks by making local-to-local test calls, one-plus test calls over the Centralized Automatic Message Accounting (CAMA) trunks, zero-plus test calls over the Traffic Service Position System (TSPS) trunks, and local calls to neighboring exchanges over the Extended Area Service (EAS) trunks.

In addition, the Company agreed to test cable pairs in all of its central offices each quarter by running its 4-TEL test equipment at the "C" level of sensitivity and to repair the cable pairs where major faults are detected. The "C" level in the 4-Tel test is equal in level to the tests performed by the Commission's Technical Services Staff. Technical Services Staff performs these tests with a Micro-Computer 77S Cable Analyzer. The 4-Tel test equipment and the 77S Cable Analyzer are both designed to identify cable pairs that have major faults. These major faults are physical faults that may or may not render a line out of service but that do degrade the level of service that is provided to the customer. The Company agreed in the Stipulation that it would submit the results of these tests to the Staff each quarter.

Over the past six years, Sprint has made the tests as required and has submitted the results of the tests to Staff. Technical Services Staff believes that the Company has carried out the conditions of the Stipulation to the letter. At the end of this year (1999) Sprint will have replaced all of its step-by-step central offices with either digital host or remote switches. Therefore, the testing of those step-by-step offices will no longer be an issue. The only other testing that the Stipulation requires is the 4-Tel testing that has continued over the past six years.

When the Stipulation was signed, Staff was concerned about Sprint's ability to offer adequate service on a continuous basis. Over the past six years, Staff has had ample opportunity to observe the Company's quality of service. Technical Services Staff has analyzed the quarterly "Quality of Service Reports", has performed cable pair audits and has analyzed the results of United's testing of cable pairs and step-by-step central offices. Technical Services Staff has found that Sprint has demonstrated considerable improvement over the past six years in the areas of its service offerings covered by the Stipulation. This improvement, in large part, is due to the modernization of its telecommunications network in Missouri. As the Company improved and modernized its facilities, many of the early problems were solved and eliminated.

Sprint is correct in its statement that no other local exchange company is required to make these tests and to report the results to Staff. The requirements of the Stipulation were intended to give Technical Services Staff an opportunity to observe Sprint's service more closely than would be possible without the testing. Based on the record, Sprint has produced over the past six years and the quality of service that it provides today, Staff believes that the Company should be relieved of the requirements imposed by the Stipulation that the parties entered into in Case No. TR-93-181.