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New London submitted rate and cost information setting out the cost to provide various portions of the 911 service and the rates to be charged. Staff stated in its memorandum that the rates proposed by New London are significantly higher than rates recently approved by the Commission for similar services with other telecommunications companies. Staff noted that the rates charged for trunks are mileage based rather than flat rated. Staff has suggested that a \$25.00 per month flat rate is more common in the industry. Staff also noted that the rate for the Automatic Location Identification (ALI) database updates is substantially higher than similar rates recently approved by the Commission. In support of this, Staff cited tariff file no. 98000784 as approved for the Miller Telephone Company. Staff noted that it did not necessarily accept the cost studies or the rate

methodology employed by New London. However, Staff was hesitant to recommend against the approval of a 911 service. Staff based its recommendation for approval upon the need to provide emergency 911 services to Ralls County.

The Commission has carefully reviewed the tariff sheets filed by New London and the memorandum prepared by Staff. The Commission empathizes with Staff's hesitance at recommending against approval of a 911 service. State-wide uninhibited access to emergency 911 service is a goal which the Commission supports without reservation. However, the rates and charges proposed by New London appear excessive and the Commission cannot approve them as presented in the tariff. New London's cost studies and rate methodology are insufficient to support the level of rates which New London proposes. The Commission is concerned by New London's proposal to charge \$.60 for a database monthly update per subscriber record where the more common practice is closer to \$.38 per subscriber record. The Commission is particularly concerned by New London's proposal to charge a mileage fee and a trunk termination fee for the interoffice trunk portion.

In addition, the Commission is troubled by the proposal set out in Section 4, Sheet 33 A footnote (2) where New London identifies certain elements and states "These items are purchased from the Company's Special Access Tariff, Section 10, and shall change as those rates change. The Company will be reimbursed through the settlement with Southwestern Bell." This component of the tariff would allow the rates for 911 service to increase in relation or response to changes in other tariffs which are not set out on this sheet. This hidden variable could mean that increases to unrelated tariffs would result in even greater fees for 911 service.

The Commission is anxious to see 911 service available in every county in Missouri, but cannot accept the rate structure proposed by New

London. The Commission encourages New London to refile the proposed tariff with a more appropriate rate structure, such as the flat rates used elsewhere in industry. The Commission's Staff is prepared to work with New London, as well as every other telecommunications provider, to ensure appropriate tariff provisions and to facilitate the approval process. In addition, the Commission is prepared to expedite its consideration of a subsequent filing of this tariff so that 911 service will be provided to the public as quickly as possible.

The Commission must reject the tariff, as submitted.

**IT IS THEREFORE ORDERED:**

1. That tariff sheet 9900059, docketed as Commission Case File TT-99-92 is hereby rejected.
2. That this order is effective on September 3, 1998.

**BY THE COMMISSION**



**Dale Hardy Roberts**  
**Secretary/Chief Regulatory Law Judge**

(S E A L)

Lumpe, Ch., Crumpton, Murray,  
and Schemenauer, CC., Concur.  
Drainer, C., Absent.

Roberts, Chief Regulatory Law Judge

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COMMISSION COUNSEL  
PUBLIC SERVICE COMMISSION