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STATE OF MISSOURI
PUBLIC SERVICE COMMISSION

At a session of the Public Service
Commission held at its office
in Jefferson City on the 29th
day of September, 1998.

In the Matter of the Application of LDD, Inc.)
For a Certificate of Authority to Provide)
Basic Exchange and Local Exchange Intrastate) Case No. TA-98-338
Telecommunications Services with the State)
of Missouri.)

ORDER GRANTING CERTIFICATE TO PROVIDE
BASIC LOCAL TELECOMMUNICATIONS SERVICES

Procedural History

LDD, Inc. (LDD) applied to the Commission on February 9, 1998, for certificates of service authority to provide basic local exchange and local exchange intrastate telecommunications services in Missouri under Sections 392.430 - .440, RSMo 1994¹, and Sections 392.450 and .451, RSMo Supp. 1997. LDD asked the Commission to classify it as a competitive company and waive certain statutes and rules as authorized by Sections 392.361 and 392.420. LDD is a Missouri corporation. LDD's offices are located at 24 South Minnesota, Cape Girardeau, Missouri 63703.

The Commission issued a Notice and Schedule of Applicants on February 18, directing interested parties wishing to intervene to do so by March 20. The Commission granted permission to intervene to Southwestern Bell Telephone Company (SWBT) on April 22.

The parties filed a Stipulation and Agreement (Agreement) on July 8 which is included with this order as Attachment 1. The Staff of

¹ All statutory references are to Revised Statutes of Missouri 1994 unless otherwise indicated.

the Commission (Staff) filed Suggestions in Support of the Agreement on September 10. In the Agreement, the parties waived their rights to present testimony, cross-examine witnesses, present oral argument or briefs, and to seek rehearing or judicial review. The requirement for a hearing is met when the opportunity for hearing has been provided and no proper party has requested the opportunity to present evidence. State ex rel. Rex Deffenderfer Enterprises, Inc. v. Public Service Commission, 776 S.W.2d 494, 496 (Mo. App. 1989). Since no one has requested a hearing, the Commission may grant the relief requested based on the verified application.

Discussion

LDD wishes certification to provide basic local exchange and local exchange telecommunications services. Local exchange services are considered competitive services and are subject to different rules and statutory requirements than are basic local exchange services. Therefore, they will be considered separately in the discussion below. LDD wants to provide basic local exchange services in all exchanges in Missouri that are currently served by SWBT. LDD is not asking for certification in any area that is served by a small incumbent local exchange provider (ILEC). The specific exchanges in which LDD proposes to operate are described in Exhibit C of LDD's application (Attachment 2 to this order). LDD is requesting that its basic local and local exchange services be classified as competitive and that the application of certain statutes and regulatory rules be waived.

A. Requirements of 4 CSR 240-2.060(4)

Commission rule 4 CSR 240-2.060(4)(A) requires a Missouri corporation applying for certification to provide telecommunications services to include in its application a certified copy of its Articles of Incorporation and a Certificate of Incorporation from the Secretary of State, a description of the types of service it intends to provide, a description of the exchanges where it will offer service, and a proposed tariff with a 45-day effective date. LDD has provided all the required documentation except for the proposed tariff. The company requested a temporary waiver of 4 CSR 240-2.060(4)(H) because, when it applied for certification, it was not party to an approved interconnection agreement with SWBT. LDD indicated it had entered into an interconnection agreement with SWBT and that this agreement was pending before the Commission in Case No. TO-98-492. LDD agreed to submit to the Commission for approval a proposed tariff with at least a minimum 45-day effective date within 30 days of the order approving the interconnection agreement or granting the basic local and local exchange certificate and authority, whichever occurred later. The Commission approved the interconnection agreement in TO-98-492 on July 31; therefore no obstacle remains to LDD's tariff filing. LDD will file the tariff in this case and give notice of the tariff filing to all the parties and participants. Along with that filing LDD has agreed to provide a written disclosure of all interconnection agreements it has entered into which affect its Missouri service areas.

B. Local Exchange Certification

The Commission finds that LDD's entry into competition in the local exchange telecommunications market is in the public interest and the company should be granted a certificate of service authority. The Commission finds that the local exchange services LDD proposes to offer are competitive and the company should be classified as a competitive company. The Commission is of the opinion that waiving the statutes and Commission rules set out in the Ordered Paragraph below is reasonable and not detrimental to the public interest.

C. Basic Local Service Certification

Section 392.455, RSMo Supp. 1997, sets out the requirements for granting certificates to provide basic local telecommunications service to new entrants. A new entrant must: (1) possess sufficient technical, financial and managerial resources and abilities to provide basic local telecommunications service; (2) demonstrate that the services it proposes to offer satisfy the minimum standards established by the Commission; (3) set forth the geographic area in which it proposes to offer service and demonstrate that such area follows exchange boundaries of the incumbent local exchange telecommunications company and is no smaller than an exchange; and (4) offer basic local telecommunications service as a separate and distinct service. In addition, the Commission must give due consideration to equitable access for all Missourians to affordable telecommunications services, regardless of where they live or their income.

LDD submitted Exhibit D with its application which lists the names and qualifications of its management team. In addition to academic

credentials, the team members have experience in various areas of the telecommunications industry including sales, customer service, product development, accounting, and marketing. LDD submitted as Exhibit E its Combined Financial Statements for the Year Ended December 31, 1996 which contain information regarding LDD's financial status including listings of LDD's Assets, Liabilities and Stockholder Equity, and Combined Statements of Income and Retained Earnings. The parties agreed that LDD possesses sufficient technical, financial and managerial resources and abilities to provide basic local telecommunications service.

LDD has agreed to provide services that will meet the minimum basic local service standards required by the Commission, including quality of service and billing standards. The parties agreed that LDD proposes to offer basic local services that satisfy the minimum standards established by the Commission.

LDD wishes to be certificated to offer services in all the exchanges presently served by SWBT as described in its basic local tariff (see Exhibit C to the application). The parties agreed that LDD has sufficiently identified the geographic area in which it proposes to offer basic local service and that the area follows ILEC exchange boundaries and is no smaller than an exchange.

LDD has agreed to offer basic local telecommunications service as a separate and distinct service and to provide equitable access, as determined by the Commission, for all Missourians within the geographic area in which it will offer basic local services in compliance with Section 392.455(5), RSMo Supp. 1997.

D. Competitive Classification

The Commission may classify a telecommunications provider as a competitive company if the Commission determines it is subject to sufficient competition to justify a lesser degree of regulation. § 392.361.2. In making that determination the Commission may consider such factors as market share, financial resources and name recognition, among others. In the Matter of the Investigation for the Purpose of Determining the Classification of the Services Provided by Interexchange Telecommunications Companies Within the State of Missouri, 30 Mo. P.S.C. (N.S.) 16 (1989); In the Matter of Southwestern Bell Telephone Company's Application for Classification of Certain Services as Transitionally Competitive, 1 Mo. P.S.C. 3d 479, 484 (1992). In addition, all the services a competitive company provides must be classified as competitive. § 392.361.3. The Commission has found that whether a service is competitive is a subject for case-by-case examination and that different criteria may be given greater weight depending upon the service being considered. *Id.* at 487.

The parties have agreed that LDD should be classified as a competitive telecommunications company. The parties have also agreed that LDD's switched exchange access services may be classified as a competitive service, conditioned upon certain limitations on LDD's ability to charge for its access services. LDD has agreed that, unless otherwise ordered by the Commission, its originating and terminating access rates will be no greater than the lowest Commission-approved corresponding access rates in effect at the date of certification for the large incumbent LECs within those service areas in which LDD seeks to operate. The parties have agreed that the grant of service authority and

competitive classification to LDD should be expressly conditioned on the continued applicability of Section 392.200, RSMo Supp. 1997, and on the requirement that any increases in switched access services rates above the maximum switched access service rates set forth in the agreement must be cost-justified pursuant to Sections 392.220, RSMo Supp. 1997, and 392.230, rather than Sections 392.500 and 392.510.

The parties agreed that waiver of the following statutes is appropriate: Sections 392.210.2, 392.270, 392.280, 392.290.1, 392.300.2, 392.310, 392.320, 392.330, RSMo Supp. 1997, and 392.340. The parties also agreed that application of these Commission rules could be waived: 4 CSR 240-10.020, 4 CSR 240-30.040, and 4 CSR 240-35.

Findings of Fact

The Missouri Public Service Commission, having considered all of the competent and substantial evidence upon the whole record, makes the following findings of fact:

- A. The Commission finds that competition in the local exchange and basic local exchange telecommunications markets is in the public interest.
- B. The Commission finds that LDD has met the requirements of 4 CSR 240-2.060(4) for applicants for certificates of service authority to provide telecommunications services with the exception of the filing of a tariff with a 45-day effective date.
- C. The Commission finds that LDD has demonstrated good cause to support a temporary waiver of the tariff filing requirement and the waiver shall be granted. However, the Commission also finds that LDD is party to an approved interconnection

agreement and should file its basic local tariff in this case.

- D. The Commission finds that the local exchange services market is competitive and that granting LDD a certificate of service authority to provide local exchange telecommunications services is in the public interest. LDD's certificate should become effective when its tariff becomes effective.
- E. The Commission finds that LDD meets the statutory requirements for provision of basic local telecommunications services and has agreed to abide by those requirements in the future. The Commission determines that granting LDD a certificate of service authority to provide basic local exchange telecommunications services is in the public interest. LDD's certificate shall become effective when its tariff becomes effective.
- F. The Commission finds that LDD is a competitive company and should be granted waiver of the statutes and rules set out in the Ordered Paragraph below.
- G. The Commission finds that LDD's certification and competitive status are expressly conditioned upon the continued applicability of Section 392.200, RSMo Supp. 1997, and on the requirement that any increases in switched access services rates above the maximum switched access service rates set forth in the agreement must be cost-justified pursuant to Sections 392.220, RSMo Supp. 1997, and 392.230, rather than Sections 392.500 and 392.510.

Conclusions of Law

The Missouri Public Service Commission has reached the following conclusions of law:

The Commission has the authority to grant certificates of service authority to provide telecommunications service within the state of Missouri. LDD has requested certification under Sections 392.420 - .440, and Sections 392.410 and .450, RSMo Supp. 1997 which permit the Commission to grant a certificate of service authority where the grant of authority is in the public interest. Sections 392.361 and .420 authorize the Commission to modify or suspend the application of its rules and certain statutory provisions for companies classified as competitive or transitionally competitive.

The Federal Telecommunications Act of 1996 and Section 392.455, RSMo Supp. 1997, were designed to institute competition in the basic local exchange telecommunications market in order to benefit all telecommunications consumers. See Section 392.185, RSMo Supp. 1997.

The Commission has the legal authority to accept a Stipulation and Agreement as offered by the parties as a resolution of the issues raised in this case, pursuant to Section 536.060, RSMo Supp. 1997. Based upon the information contained within the Stipulation and Agreement of the parties, and upon its findings of fact, the Commission concludes that the Stipulation and Agreement should be approved.

IT IS THEREFORE ORDERED:

1. That the Stipulation and Agreement of the parties, filed on July 8, 1998, is approved.
2. That LDD, Inc. is granted a certificate of service authority to provide local exchange telecommunications services in the state of

Missouri to become effective when the company's tariff becomes effective, subject to all applicable statutes and Commission rules except as specified in this order.

3. That LDD, Inc. is granted a certificate of service authority to provide basic local telecommunications services in the state of Missouri, subject to the conditions of certification set out above and to all applicable statutes and Commission rules except as specified in this order. The certificate of service authority shall become effective when the company's tariff becomes effective.

4. That LDD, Inc. is classified as a competitive telecommunications company. Application of the following statutes and regulatory rules shall be waived:

Statutes

392.210.2 - uniform system of accounts
392.270 - valuation of property (ratemaking)
392.280 - depreciation accounts
392.290.1 - issuance of securities
392.300.2 - acquisition of stock
392.310 - stock and debt issuance
392.320 - stock dividend payment
392.340 - reorganization(s)
392.330, RSMo Supp. 1997 - issuance of securities,
debts and notes

Commission Rules

4 CSR 240-10.020 - depreciation fund income
4 CSR 240-30.040 - uniform system of accounts
4 CSR 240-35 - reporting of bypass and
customer-specific arrangements

5. That the request for waiver of the filing of 4 CSR 240-2.060(4)(H) which requires the filing of a 45-day tariff is granted.

6. That LDD, Inc. shall file tariff sheets with a 45-day effective date reflecting the rates, rules, regulations and the services it will offer no later than 30 days after the effective date of this

order as the Commission issued an order approving an interconnection agreement between it and Southwestern Bell Telephone Company in Case No. TO-98-492 on July 21, 1998. The tariff sheets shall be filed in Case No. TA-98-338 and shall include a listing of the statutes and Commission rules waived above.

7. That LDD, Inc. shall give notice of the filing of the tariffs described above to all parties or participants. In addition, LDD, Inc. shall file a written disclosure of all interconnection agreements which affect its Missouri service areas, all portions of Missouri service areas for which it does not have an interconnection agreement, and an explanation of why no interconnection agreement is necessary for those areas.

8. That LDD, Inc.'s certification and competitive status are expressly conditioned upon the continued applicability of Section 392.200, RSMo Supp. 1997, and on the requirement that any increases in switched access service rates above the maximum switched access service rates set forth in the agreement must be cost-justified pursuant to Sections 392.220, RSMo Supp. 1997, and 392.230, rather than Sections 392.500 and 392.510.

9. That any remaining procedural dates, including those for the prehearing conference and evidentiary hearing, contained in the procedural schedule issued on July 6, 1998 are canceled.

10. That this Order shall become effective on October 9, 1998.

BY THE COMMISSION

A handwritten signature in cursive script that reads "Dale Hardy Roberts".

Dale Hardy Roberts
Secretary/Chief Regulatory Law Judge

(S E A L)

Lumpe, Ch., Crumpton, Drainer,
Murray and Schemenauer, CC.,
concur.

Harper, Regulatory Law Judge

BEFORE THE PUBLIC SERVICE COMMISSION
STATE OF MISSOURI

FILED
JUL - 8 1998

Missouri Public
Service Commission

In the matter of the Application of LDD, Inc.)
for a Certificate of Authority to Provide)
Basic Exchange and Local Exchange) Case No. TA-98-338
Intrastate Telecommunications Services within)
the State of Missouri.)

STIPULATION AND AGREEMENT

LDD, Inc. (hereinafter "LDD") initiated this proceeding on February 9, 1998 by filing an Application requesting certificate of service authority to provide basic local exchange and local exchange services in exchanges currently served by Southwestern Bell Telephone Company.

Southwestern Bell Telephone Company (SWB) timely applied to intervene in this matter and its application was granted.

A. STANDARDS AND CRITERIA

1. The parties employed the following standards and criteria, which are intended to meet the requirements of existing law, particularly Sections 392.450 and 392.455, RSMo. Cum Supp. 1997 regarding applications for certificates of local exchange service authority to provide or resell basic local telecommunications service, in negotiating the provisions of this Stipulation and Agreement.

2. For purposes of this Stipulation and Agreement, the parties agree that applications for local exchange and basic local exchange service authority in exchanges served by "large" local exchange companies (LECs)¹ should be processed in a manner similar to that in which applications

¹Large LECs are defined as LECs who serve 100,000 or more access lines. Section 386.020 RSMo. Supp. 1997. In Missouri, the current large LECs are SWBT, GTE and United.

for interexchange authority are currently handled.

3. In determining whether LDD's application for certificate of service authority should be granted, the Commission should consider LDD's technical, financial and managerial resources and abilities to provide basic local telecommunications service. LDD must demonstrate that the basic local services it proposes to offer satisfy the minimum standards established by the Commission, including but not limited to the applicant agreeing to file and maintain basic local service tariff(s) with the Commission in the same manner and form as the Commission requires of incumbent local exchange telecommunications companies with which applicant seeks to compete. Further, LDD must agree to meet the minimum basic local service standards, including quality of service and billing standards, as the Commission requires of the incumbent local exchange telecommunications companies with which the applicant seeks to compete. Notwithstanding the provisions of Section 392.500 RSMo (1994), as a condition of certification and competitive classification, LDD must agree that, unless otherwise ordered by the Commission, its originating and terminating access rates will be no greater than the lowest Commission approved corresponding access rates in effect at the date of certification for the large incumbent LEC(s) within those service area(s) applicant seeks authority to provide service. Further, LDD must agree to offer basic local telecommunications service as a separate and distinct service and must sufficiently identify the geographic service area in which it proposes to offer basic local service. Such area must follow exchange boundaries of the incumbent local exchange telecommunications companies in the same area and must be no smaller than an exchange. Finally, LDD must agree to provide equitable access as determined by the Commission for all Missourians within the geographic area in which it proposes to offer basic local service, regardless of where they live or their income, to affordable

telecommunications services. See Section 392.455 RSMo Cum. Supp. 1997.

4. LDD submitted its application without tariffs and seeks a temporary waiver of 4 CSR 240-2.060(4)(H).² LDD has agreed to file its initial tariff(s) in the certification docket and serve all parties thereto with written notice at the time the initial tariff(s) are submitted to afford them an opportunity to participate in the tariff approval process. Copies of the tariff(s) will be provided by LDD to such parties immediately upon request. Any service authority shall be regarded as conditional and shall not be exercised until such time as tariff(s) for services have become effective. When filing its initial basic local tariff, LDD shall also file and serve a written disclosure of all interconnection agreements which affect its Missouri service areas, all portions of its Missouri service areas for which it does not have an interconnection agreement with the incumbent local exchange carrier; and its explanation of why such an interconnection agreement is unnecessary for such areas.

5. LDD has, pursuant to §392.420 RSMo. requested that the Commission waive the application of any or all of the following statutory provisions and rules to basic local telecommunications services, and the parties agree that the Commission should grant such request provided that Section 392.200 RSMo should continue to apply to all of LDD's services:

²Good cause for failure to file proposed tariffs with the Application must be shown. The lack of an approved interconnection agreement (47 USC §252) constitutes good cause.

STATUTORY PROVISIONS

§392.210.2
§392.270
§392.280
§392.290.1
§392.300.2
§392.310
§392.320
§392.330
§392.340

COMMISSION RULES

4 CSR 240-10.020
4 CSR 240-30.040
4 CSR 240-35

B. LDD CERTIFICATION

6. LDD hereby agrees that its application should be deemed amended to include by reference the terms and provisions described in paragraphs 2-4 hereinabove.

7. Based upon its verified application, as amended, LDD asserts, and no party makes a contrary assertion, that there is sufficient evidence from which the Commission can find and conclude that LDD:

- a. possesses sufficient technical, financial and managerial resources and abilities to provide basic local telecommunications service and local exchange telecommunications service, including exchange access service;
- b. proposes and agrees to offer basic local services that satisfy the minimum standards established by the Commission;
- c. has sufficiently identified the geographic area in which it proposes to offer basic local service and such area follows exchange boundaries of the incumbent local exchange telecommunications companies in the same areas,

and such area is no smaller than an exchange;³

- d. will offer basic local telecommunications service as a separate and distinct service;
- e. has agreed to provide equitable access for all Missourians as determined by the Commission for all Missourians within the geographic area in which it proposes to offer basic local service, regardless of where they live or their income, to affordable telecommunications services;⁴
- f. has sought authority which will serve the public interest.

8. LDD asserts, and no party opposes, that LDD's application and request for authority to provide basic local telecommunications services and local exchange telecommunications services (including exchange access service) should be granted. All services authorized herein should be classified as competitive telecommunications services provided that the requirements of Section 392.200 continue to apply, and LDD shall remain classified as a competitive telecommunications company. LDD asserts, and no party opposes, such services will be subject to sufficient competition by the services of the incumbent LECs to justify a lesser degree of regulation of LDD's services consistent with the protection of ratepayers and the promotion of the public interest. Such classification should become effective upon the tariffs for the services becoming effective. Such authority should be conditional, not to be exercised until such time as tariffs for those services have

³ The identification of specific geographic areas within which LDD proposes to offer service as referred to in this paragraph shall not be construed to foreclose LDD from petitioning the Commission pursuant to Section 392.200.4 and .8, RSMo.

⁴The agreement in Paragraph 6 e. of this Stipulation and Agreement is without prejudice to LDD's right to appear, after proper application and in accord with Commission rules and regulations, in any rulemaking proceeding or other proceeding regarding the Commission's considerations of equitable access under Section 392.455.(5), RSMo. Furthermore, such agreement should not be construed as an admission or conclusion by LDD that Section 392.455.(5), RSMo. creates new or specific duties or obligations on telecommunications companies to provide equitable access.

been filed (together with the written disclosure as stipulated above) and have become effective. The Commission's Order should state the foregoing conditions substantially as follows:

"The service authority and service classification herein granted are subject to the requirements of Section 392.200 and are conditional and shall not be exercised until such time as tariffs for services have become effective."

The parties agree that the applicant's switched exchange access services may be classified as competitive services. The parties further agree that the applicant's switched exchange access services are subject to Section 392.200. Any increases in switched access service rates above the maximum switched access service rates as set forth in paragraph 2 herein shall be cost-justified and be made pursuant to Sections 392.220 and 392.230 and not 392.500 and 392.510. The Commission's order should state the foregoing conditions substantially as follows:

"The service authority and service classification for switched exchange access granted herein is expressly conditioned on the continued applicability of Section 392.200 and the requirement that any increases in switched access service rates above the maximum switched access service rates set forth herein shall be cost-justified and pursuant to Sections 392.220 and 392.230 and not Sections 392.500 and 392.510."

9. LDD's request for a waiver of 4 CSR 240-2.060(4)(H), which requires applications to include a proposed tariff with a 45-day effective date, is not opposed by the parties and should be granted because at the time of its application, it did not yet have approved interconnection agreements with the large incumbent LECs. Since the filing of LDD's application, the LDD and SWB have entered an interconnection agreement which pends before the Commission in Case No. TO-98-492, and has not yet been approved. Accordingly, LDD agrees that within thirty (30) days of the order approving the interconnection agreement in Case No. TO-98-492, or the order granting the certificate and authority described herein, whichever occurs later, LDD will submit tariffs in this

docket, with a minimum 45-day proposed effective date, to the Commission for its approval, together with the written disclosure as stipulated above. LDD shall serve notice to all parties and participants in this docket of the filing of its tariffs at the time they are filed with the Commission and serve them with the aforesaid written disclosure and shall upon request immediately provide any party with a copy of those tariffs. The Commission's order should state these obligations as conditions to the waiver of 4 CSR 240-2.060(4)(H), substantially as follows:

"Applicant's request for temporary waiver of 4 CSR 240-2.060(4)(H) is hereby granted. Within thirty (30) days of the effective date of this order, or the effective date of the order in Case No. TO-98-492, whichever occurs later, Applicant shall submit its tariffs for Commission approval. Such tariffs shall have a minimum of a 45-day effective date and the applicant shall serve written notice upon the parties hereto of such submittal, and shall provide copies of such tariffs to such parties immediately upon request. When filing its initial basic local tariff in this docket, the applicant shall also file and serve upon the parties hereto a written disclosure of: all interconnection agreements which affect its Missouri service areas; all portions of its Missouri service areas for which it does not have an interconnection agreement with the incumbent local exchange carrier; and its explanation of why such an interconnection agreement is unnecessary for any such areas."

10. LDD's request for waiver of the application of the following rules and statutory provisions as they relate to the regulation of LDD's services should be granted:

STATUTORY PROVISIONS

§392.210.2
§392.270
§392.280
§392.290.1
§392.300.2
§392.310
§392.320
§392.330
§392.340

COMMISSION RULES

4 CSR 240-10.020
4 CSR 240-30.040
4 CSR 240-35

11. This Stipulation and Agreement has resulted from extensive negotiations among the signatories and the terms hereof are interdependent. In the event the Commission does not adopt this Stipulation in total, then this Stipulation and Agreement shall be void and no signatory shall be bound by any of the agreements or provisions hereof. The Stipulations herein are specific to the resolution of this proceeding, and all stipulations are made without prejudice to the rights of the signatories to take other positions in other proceedings.

12. In the event the Commission accepts the specific terms of this Stipulation and Agreement, the parties and participants waive, with respect to the issues resolved herein: their respective rights pursuant to §536.080.1, RSMo 1994, to present testimony, to cross examine witnesses, and to present oral argument or written briefs; their respective rights to the reading of the transcript by the Commission pursuant to §536.080.2, RSMo 1994; and their respective rights to seek rehearing pursuant to §386.500 RSMo 1994 and to seek judicial review pursuant to §386.510, RSMo 1994. The parties agree to cooperate with the Applicant and with each other in presenting

this Stipulation and Agreement for approval to the Commission and shall take no action, direct or indirect, in opposition to the request for approval of the LDD application made herein.

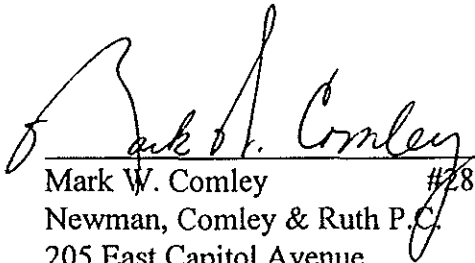
13. The Staff may submit a Staff Recommendation concerning matters not addressed in this Stipulation. In addition, if requested by the Commission, the Staff shall have the right to submit to the Commission a memorandum explaining its rationale for entering into this Stipulation and Agreement. Each party of record and participant herein shall be served with a copy of any memorandum and shall be entitled to submit to the Commission, within five (5) days of receipt of Staff's memorandum, a responsive memorandum which shall also be served on all parties and participants. All memoranda submitted by the parties shall be considered privileged in the same manner as settlement discussions under the Commission's rules, shall be maintained on a confidential basis by all parties and participants, and shall not become a part of the record of this proceeding or bind or prejudice the party submitting such memorandum in any future proceeding or in this proceeding whether or not the Commission approves this Stipulation and Agreement. The contents of any memorandum provided by any party are its own and are not acquiesced in or otherwise adopted by the other signatories to the Stipulation and Agreement, whether or not the Commission approves and adopts this Stipulation and Agreement.

The Staff shall also have the right to provide, at any agenda meeting at which this Stipulation and Agreement is noticed to be considered by the Commission, whatever oral explanation the Commission requests, provided that the Staff shall, to the extent reasonably practicable, provide the other parties and participants with advance notice of when the Staff shall respond to the Commission's request for such explanation once such explanation is requested from Staff. Staff's oral explanation shall be subject to public disclosure.

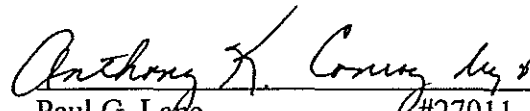
14. Finally, LDD will comply with all applicable Commission rules and regulations except those which are specifically waived by the Commission.

WHEREFORE, the signatories respectfully request the Commission to issue its Order approving the terms of this Stipulation and Agreement and issue its Order granting authority and classification as requested by LDD, subject to the conditions described above.

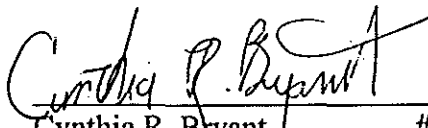
Respectfully submitted,


Mark W. Comley #28847
Newman, Comley & Ruth P.C.
205 East Capitol Avenue
P.O. Box 537
Jefferson City, MO 65102-0537

FOR: LDD, Inc.


Paul G. Lafe #27011
Leo J. Bub #34326
Anthony K. Conroy #35199
Diana J. Harter #31424
One Bell Center, Room 3520
St. Louis, Missouri 63101

FOR: Southwestern Bell Telephone
Company


Cynthia R. Bryant #47937
Assistant General Counsel
Missouri Public Service Commission
P.O. Box 360
Jefferson City, MO 65102-0360

FOR: Staff

NPA	NXX	CITY	TYPE	EA	TELCO	0+	LATA	1+ TANDEM
314	813	Bridgeton	EA		SWB	CCI	520	Ladue
314	768	Mission STL	EA		SWB	CCI	520	501
314	755	Sappington	EA		SWB	CCI	520	501
314	758	St Louis	EA		SWB	CCI	520	501
314	772	Prospect STL	EA		SWB	CCI	520	501
314	770	Bridgeton	EA		SWB	CCI	520	Ladue
314	771	Prospect STL	EA		SWB	CCI	520	501
314	773	Prospect STL	EA		SWB	CCI	520	501
314	776	Prospect STL	EA		SWB	CCI	520	501
314	821	Kirkwood	EA		SWB	CCI	520	Ladue
314	822	Kirkwood	EA		SWB	CCI	520	Ladue
314	780	St Louis	EA		SWB	CCI	520	501
314	747	Parkview STL	EA		SWB	CCI	520	501
314	746	Parkview STL	EA		SWB	CCI	520	501
314	823	Forest STL	EA		SWB	CCI	520	501
314	810	Ladue	EA		SWB	CCI	520	Ladue
314	750	Flanders STL	EA		SWB	CCI	520	501
314	753	Ptdesioux	EA		SWB	CCI	520	Ladue
314	752	Flanders STL	EA		SWB	CCI	520	501
314	809	Kirkwood	EA		SWB	CCI	520	Ladue
314	777	Bridgeton	EA		SWB	CCI	520	Ladue
314	818	Washington	EA		SWB	CCI	520	501
314	206	St Louis	EA		SWB	CCI	520	501
314	804	Overland	EA		SWB	CCI	520	Ladue
314	814	St Louis	EA		SWB	CCI	520	501
314	805	Kirkwood	EA		SWB	CCI	520	Ladue
314	799	St Louis	EA		SWB	CCI	520	501
314	803	Kirkwood	EA		SWB	CCI	520	Ladue
314	817	Ladue	EA		SWB	CCI	520	Ladue
314	802	St Louis	EA		SWB	CCI	520	501
314	742	Graysummit	EA		SWB	CCI	520	Ladue
314	797	Hillsboro	EA		SWB	CCI	520	501
314	807	Kirkwood	EA		SWB	CCI	520	Ladue
314	806	Kirkwood	EA		SWB	CCI	520	Ladue
314	801	Overland	EA		SWB	CCI	520	Ladue
314	789	Hillsboro	EA		SWB	CCI	520	501
314	781	Mission STL	EA		SWB	CCI	520	501
314	808	Kirkwood	EA		SWB	CCI	520	Ladue
314	791	St Louis	EA		SWB	CCI	520	501
314	790	Overland	EA		SWB	CCI	520	Ladue
314	795	St Louis	EA		SWB	CCI	520	501
314	818	Kennett	EA		SWB	CCI	520	Sikeston
314	812	Ladue	EA		SWB	CCI	520	Ladue
314	205	Creve Coeur	EA		SWB	CCI	520	Ladue
314	725	Parkview STL	EA		SWB	CCI	520	501

NPA	NXX	CITY	TYPE	EA	TELCO	0+	LATA	1+ TANDEM
314	741	Spanish Lake	EA		SWB	CCI	520	Ladue
314	740	Ladue	EA		SWB	CCI	520	Ladue
314	682	Creve Coeur	EA		SWB	CCI	520	Ladue
314	674	Ladue	EA		SWB	CCI	520	Ladue
314	677	High Ridge	EA		SWB	CCI	520	501
314	679	Evergreen STL	EA		SWB	CCI	520	501
314	681	Chesterfield	EA		SWB	CCI	520	Ladue
314	683	Ferguson	EA		SWB	CCI	520	Ladue
314	671	High Ridge	EA		SWB	CCI	520	501
314	685	Harvester	EA		SWB	CCI	520	Ladue
314	686	Manchester	EA		SWB	CCI	520	Ladue
314	687	Overland	EA		SWB	CCI	520	Ladue
314	688	St Charles	EA		SWB	CCI	520	Ladue
314	672	St Louis	EA		SWB	CCI	520	501
314	666	Kirkwood	EA		SWB	CCI	520	Ladue
314	670	St Louis	EA		SWB	CCI	520	501
314	691	Kirkwood	EA		SWB	CCI	520	Ladue
314	656	Bridgeton	EA		SWB	CCI	520	Ladue
314	652	Jefferson STL	EA		SWB	CCI	520	501
314	653	Spanish Lake	EA		SWB	CCI	520	Ladue
314	654	Ferguson	EA		SWB	CCI	520	Ladue
314	655	St Louis	EA		SWB	CCI	520	501
314	657	St Louis	EA		SWB	CCI	520	501
314	664	Prospect STL	EA		SWB	CCI	520	501
314	658	Jefferson STL	EA		SWB	CCI	520	501
314	659	St Louis	EA		SWB	CCI	520	501
314	660	St Louis	EA		SWB	CCI	520	501
314	663	St Louis	EA		SWB	CCI	520	501
314	689	Valley Park	EA		SWB	CCI	520	Ladue
314	693	Ladue	EA		SWB	CCI	520	Ladue
314	692	Ladue	EA		SWB	CCI	520	Ladue
314	739	Bridgeton	EA		SWB	CCI	520	Ladue
314	730	Sappington	EA		SWB	CCI	520	501
314	825	Valley Park	EA		SWB	CCI	520	Ladue
314	726	Parkview STL	EA		SWB	CCI	520	501
314	727	Parkview STL	EA		SWB	CCI	520	501
314	729	Sappington	EA		SWB	CCI	520	501
314	731	Bridgeton	EA		SWB	CCI	520	Ladue
314	723	St Charles	EA		SWB	CCI	520	Ladue
314	733	Chesterfield	EA		SWB	CCI	520	Ladue
314	735	Chesterfield	EA		SWB	CCI	520	Ladue
314	736	Chesterfield	EA		SWB	CCI	520	Ladue
314	737	Chesterfield	EA		SWB	CCI	520	Ladue
314	724	St Charles	EA		SWB	CCI	520	Ladue
314	719	St Louis	EA		SWB	CCI	520	501

NPA	NXX	CITY	TYPE	EA	TELCO	0+	LATA	1+ TANDEM
314	721	Parkview STL	EA		SWB	CCI	520	501
314	694	Ladue	EA		SWB	CCI	520	Ladue
314	708	Ladue	EA		SWB	CCI	520	Ladue
314	702	Bridgeton	EA		SWB	CCI	520	Ladue
314	703	Ladue	EA		SWB	CCI	520	Ladue
314	704	Ladue	EA		SWB	CCI	520	Ladue
314	705	Ladue	EA		SWB	CCI	520	Ladue
314	709	Ladue	EA		SWB	CCI	520	Ladue
314	716	Ladue	EA		SWB	CCI	520	Ladue
314	712	Ladue	EA		SWB	CCI	520	Ladue
314	713	Ladue	EA		SWB	CCI	520	Ladue
314	714	Ladue	EA		SWB	CCI	520	Ladue
314	715	Ladue	EA		SWB	CCI	520	Ladue
314	824	Ladue	EA		SWB	CCI	520	Ladue
314	838	Florissant	EA		SWB	CCI	520	Ladue
314	826	Forest STL	EA		SWB	CCI	520	501
314	948	Antonia	EA		SWB	CCI	520	501
314	941	St Louis	EA		SWB	CCI	520	501
314	942	Antonia	EA		SWB	CCI	520	501
314	944	Ware	EA		SWB	CCI	520	501
314	946	St Charles	EA		SWB	CCI	520	Ladue
314	947	St Charles	EA		SWB	CCI	520	Ladue
314	949	St Charles	EA		SWB	CCI	520	Ladue
314	939	Harvester	EA		SWB	CCI	520	Ladue
314	951	St Louis	EA		SWB	CCI	520	501
314	952	Kirkwood	EA		SWB	CCI	520	Ladue
314	952	St Louis	EA		SWB	CCI	520	501
314	953	Florissant	EA		SWB	CCI	520	Ladue
314	954	Kirkwood	EA		SWB	CCI	520	Ladue
314	940	St Charles	EA		SWB	CCI	520	Ladue
314	938	Eureka	EA		SWB	CCI	520	Ladue
314	956	Ladue	EA		SWB	CCI	520	Ladue
314	929	Kirkwood	EA		SWB	CCI	520	Ladue
314	923	St Louis	EA		SWB	CCI	520	501
314	924	Kirkwood	EA		SWB	CCI	520	Ladue
314	925	St Charles	EA		SWB	CCI	520	Ladue
314	926	Harvester	EA		SWB	CCI	520	Ladue
314	928	Harvester	EA		SWB	CCI	520	Ladue
314	930	Harvester	EA		SWB	CCI	520	Ladue
314	937	Festcrycty	EA		SWB	CCI	520	501
314	931	Festcrycty	EA		SWB	CCI	520	501
314	933	Festcrycty	EA		SWB	CCI	520	501
314	934	Ladue	EA		SWB	CCI	520	Ladue
314	935	St Louis	EA		SWB	CCI	520	501
314	936	Harvester	EA		SWB	CCI	520	Ladue

NPA	NXX	CITY	TYPE	EA	TELCO	0+	LATA	1+ TANDEM
314	955	St Louis	EA		SWB	CCI	520	501
314	957	Kirkwood	EA		SWB	CCI	520	Ladue
314	921	Florissant	EA		SWB	CCI	520	Ladue
314	993	Ladue	EA		SWB	CCI	520	Ladue
314	988	Parkview STL	EA		SWB	CCI	520	501
314	989	Ladue	EA		SWB	CCI	520	Ladue
314	990	St Louis	EA		SWB	CCI	520	501
314	991	Ladue	EA		SWB	CCI	520	Ladue
314	992	St Louis	EA		SWB	CCI	520	501
314	994	Ladue	EA		SWB	CCI	520	Ladue
314	982	Chestnut STL	EA		SWB	CCI	520	501
314	995	Ladue	EA		SWB	CCI	520	Ladue
314	996	Ladue	EA		SWB	CCI	520	Ladue
314	997	Ladue	EA		SWB	CCI	520	Ladue
314	998	High Ridge	EA		SWB	CCI	520	501
314	999	Kirkwood	EA		SWB	CCI	520	Ladue
314	984	Kirkwood	EA		SWB	CCI	520	Ladue
314	981	Ladue	EA		SWB	CCI	520	Ladue
314	960	Manchester	EA		SWB	CCI	520	Ladue
314	966	Kirkwood	EA		SWB	CCI	520	Ladue
314	961	Webster Grove	EA		SWB	CCI	520	Ladue
314	962	Webster Grove	EA		SWB	CCI	520	Ladue
314	963	St Louis	EA		SWB	CCI	520	Ladue
314	964	Ladue	EA		SWB	CCI	520	Ladue
314	965	Kirkwood	EA		SWB	CCI	520	Ladue
314	967	Webster Grove	EA		SWB	CCI	520	Ladue
314	977	St Louis	EA		SWB	CCI	520	501
314	968	Webster Grove	EA		SWB	CCI	520	Ladue
314	969	Chestnut STL	EA		SWB	CCI	520	501
314	971	Kirkwood	EA		SWB	CCI	520	Ladue
314	972	Florissant	EA		SWB	CCI	520	Ladue
314	973	Chestnut STL	EA		SWB	CCI	520	501
314	922	Harvester	EA		SWB	CCI	520	Ladue
314	920	St Louis	EA		SWB	CCI	520	501
314	827	Valley Park	EA		SWB	CCI	520	Ladue
314	855	Forest STL	EA		SWB	CCI	520	501
314	849	Sappington	EA		SWB	CCI	520	501
314	850	Forest STL	EA		SWB	CCI	520	501
314	851	Creve Coeur	EA		SWB	CCI	520	Ladue
314	852	Kirkwood	EA		SWB	CCI	520	Ladue
314	854	Parkview STL	EA		SWB	CCI	520	501
314	861	Valley Park	EA		SWB	CCI	520	Ladue
314	847	St Louis	EA		SWB	CCI	520	501
314	862	Parkview STL	EA		SWB	CCI	520	501
314	863	Parkview STL	EA		SWB	CCI	520	501

NPA	NXX	CITY	TYPE	EA	TELCO	0+	LATA	1+ TANDEM
314	865	Prospect STL	EA		SWB	CCI	520	501
314	867	Riverview	EA		SWB	CCI	520	Ladue
314	868	Riverview	EA		SWB	CCI	520	Ladue
314	848	Forest STL	EA		SWB	CCI	520	501
314	846	Oakville	EA		SWB	CCI	520	501
314	870	Overland	EA		SWB	CCI	520	Ladue
314	837	Florissant	EA		SWB	CCI	520	Ladue
314	829	St Louis	EA		SWB	CCI	520	501
314	830	Florissant	EA		SWB	CCI	520	Ladue
314	831	Florissant	EA		SWB	CCI	520	Ladue
314	832	St Louis	EA		SWB	CCI	520	501
314	836	St Louis	EA		SWB	CCI	520	501
314	650	Chestnut STL	EA		SWB	CCI	520	501
314	845	Mehlville	EA		SWB	CCI	520	501
314	839	Florissant	EA		SWB	CCI	520	Ladue
314	840	St Louis	EA		SWB	CCI	520	501
314	841	St Louis	EA		SWB	CCI	520	501
314	842	Sappington	EA		SWB	CCI	520	501
314	843	Sappington	EA		SWB	CCI	520	501
314	869	Riverview	EA		SWB	CCI	520	Ladue
314	871	St Louis	EA		SWB	CCI	520	501
314	919	Webster Grove	EA		SWB	CCI	520	Ladue
314	912	Kirkwood	EA		SWB	CCI	520	Ladue
314	905	Kirkwood	EA		SWB	CCI	520	Ladue
314	906	Kirkwood	EA		SWB	CCI	520	Ladue
314	907	Kirkwood	EA		SWB	CCI	520	Ladue
314	908	Kirkwood	EA		SWB	CCI	520	Ladue
314	910	Ladue	EA		SWB	CCI	520	Ladue
314	913	Ladue	EA		SWB	CCI	520	Ladue
314	903	Kirkwood	EA		SWB	CCI	520	Ladue
314	914	Ladue	EA		SWB	CCI	520	Ladue
314	915	Ladue	EA		SWB	CCI	520	Ladue
314	916	St Charles	EA		SWB	CCI	520	Ladue
314	917	Ladue	EA		SWB	CCI	520	Ladue
314	918	Webster Grove	EA		SWB	CCI	520	Ladue
314	904	Kirkwood	EA		SWB	CCI	520	Ladue
314	902	Kirkwood	EA		SWB	CCI	520	Ladue
314	872	Ladue	EA		SWB	CCI	520	Ladue
314	885	Kirkwood	EA		SWB	CCI	520	Ladue
314	873	Ladue	EA		SWB	CCI	520	Ladue
314	877	Evergreen STL	EA		SWB	CCI	520	501
314	878	Creve Coeur	EA		SWB	CCI	520	Ladue
314	879	Forest STL	EA		SWB	CCI	520	501
314	882	Ladue	EA		SWB	CCI	520	Ladue
314	889	Parkview STL	EA		SWB	CCI	520	501

NPA	NXX	CITY	TYPE	EA	TELCO	0+	LATA	1+ TANDEM
314	899	Ptdesioux	EA		SWB	CCI	520	Ladue
314	890	Overland	EA		SWB	CCI	520	Ladue
314	891	Chesterfield	EA		SWB	CCI	520	Ladue
314	892	Mehlville	EA		SWB	CCI	520	501
314	894	Mehlville	EA		SWB	CCI	520	501
314	895	Bridgeton	EA		SWB	CCI	520	Ladue
314	651	Fenton	EA		SWB	CCI	520	501
314	819	Creve Coeur	EA		SWB	CCI	520	Ladue
314	647	Mission STL	EA		SWB	CCI	520	501
314	646	St Louis	EA		SWB	CCI	520	501
314	360	Overland	EA		SWB	CCI	520	Ladue
314	351	Flanders STL	EA		SWB	CCI	520	501
314	352	Flanders STL	EA		SWB	CCI	520	501
314	353	Flanders STL	EA		SWB	CCI	520	501
314	355	Spanish Lake	EA		SWB	CCI	520	Ladue
314	362	Forest STL	EA		SWB	CCI	520	501
314	361	Forest STL	EA		SWB	CCI	520	501
314	348	Ladue	EA		SWB	CCI	520	Ladue
314	365	Ladue	EA		SWB	CCI	520	Ladue
314	367	Forest STL	EA		SWB	CCI	520	501
314	370	St Louis	EA		SWB	CCI	520	501
314	371	Jefferson STL	EA		SWB	CCI	520	501
314	349	Fenton	EA		SWB	CCI	520	501
314	344	Bridgeton	EA		SWB	CCI	520	Ladue
314	346	Ladue	EA		SWB	CCI	520	Ladue
314	376	High Ridge	EA		SWB	CCI	520	501
314	326	Fenton	EA		SWB	CCI	520	501
314	316	Ladue	EA		SWB	CCI	520	Ladue
314	318	St Louis	EA		SWB	CCI	520	501
314	320	Harvester	EA		SWB	CCI	520	Ladue
314	321	St Louis	EA		SWB	CCI	520	501
314	331	Chestnut STL	EA		SWB	CCI	520	501
314	330	St Louis	EA		SWB	CCI	520	501
314	343	Fenton	EA		SWB	CCI	520	501
314	337	De Soto	EA		SWB	CCI	520	501
314	340	Chestnut STL	EA		SWB	CCI	520	501
314	341	Ladue	EA		SWB	CCI	520	Ladue
314	342	Chestnut STL	EA		SWB	CCI	520	501
314	375	High Ridge	EA		SWB	CCI	520	501
314	381	Evergreen STL	EA		SWB	CCI	520	501
314	314	Ladue	EA		SWB	CCI	520	Ladue
314	418	St Louis	EA		SWB	CCI	520	501
314	410	St Louis	EA		SWB	CCI	520	501
314	412	Ladue	EA		SWB	CCI	520	Ladue
314	413	Ladue	EA		SWB	CCI	520	Ladue

NPA	NXX	CITY	TYPE	EA	TELCO	0+	LATA	1+ TANDEM
314	415	Webster Grove	EA		SWB	CCI	520	Ladue
314	419	Overland	EA		SWB	CCI	520	Ladue
314	418	St Louis	EA		SWB	CCI	520	501
314	408	St Louis	EA		SWB	CCI	520	501
314	420	St Louis	EA		SWB	CCI	520	501
314	421	Chestnut STL	EA		SWB	CCI	520	501
314	423	Overland	EA		SWB	CCI	520	Ladue
314	424	Overland	EA		SWB	CCI	520	Ladue
314	409	Ladue	EA		SWB	CCI	520	Ladue
314	406	Ladue	EA		SWB	CCI	520	Ladue
314	407	Overland	EA		SWB	CCI	520	Ladue
314	382	Evergreen STL	EA		SWB	CCI	520	501
314	390	Washington	EA		SWB	CCI	520	501
314	383	Evergreen STL	EA		SWB	CCI	520	501
314	385	Evergreen STL	EA		SWB	CCI	520	501
314	388	Riverview	EA		SWB	CCI	520	Ladue
314	389	Evergreen STL	EA		SWB	CCI	520	501
314	394	Manchester	EA		SWB	CCI	520	Ladue
314	391	Manchester	EA		SWB	CCI	520	Ladue
314	405	Pond	EA		SWB	CCI	520	Ladue
314	401	Kirkwood	EA		SWB	CCI	520	Ladue
314	402	Kirkwood	EA		SWB	CCI	520	Ladue
314	403	Harvester	EA		SWB	CCI	520	Ladue
314	404	Ladue	EA		SWB	CCI	520	Ladue
314	315	Ladue	EA		SWB	CCI	520	Ladue
314	312	Harvester	EA		SWB	CCI	520	Ladue
314	313	Ladue	EA		SWB	CCI	520	Ladue
314	426	Overland	EA		SWB	CCI	520	Ladue
314	233	Bridgeton	EA		SWB	CCI	520	Ladue
314	227	Manchester	EA		SWB	CCI	520	Ladue
314	230	Manchester	EA		SWB	CCI	520	Ladue
314	231	Chestnut STL	EA		SWB	CCI	520	501
314	232	Bridgeton	EA		SWB	CCI	520	Ladue
314	235	Chestnut STL	EA		SWB	CCI	520	501
314	234	Bridgeton	EA		SWB	CCI	520	Ladue
314	224	St Louis	EA		SWB	CCI	520	501
314	239	Washington	EA		SWB	CCI	520	501
314	241	Chestnut STL	EA		SWB	CCI	520	501
314	244	St Louis	EA		SWB	CCI	520	501
314	247	Chestnut STL	EA		SWB	CCI	520	501
314	225	Valley Park	EA		SWB	CCI	520	Ladue
314	223	St Louis	EA		SWB	CCI	520	501
314	223	Kirkwood	EA		SWB	CCI	520	Ladue
314	253	Overland	EA		SWB	CCI	520	Ladue
314	212	St Louis	EA		SWB	CCI	520	501

NPA	NXX	CITY	TYPE	EA	TELCO	0+	LATA	1+ TANDEM
314	645	Mission STL	EA		SWB	CCI	520	501
314	207	Manchester	EA		SWB	CCI	520	Ladue
314	208	St Louis	EA		SWB	CCI	520	501
314	209	Bridgeton	EA		SWB	CCI	520	Ladue
314	214	St Louis	EA		SWB	CCI	520	501
314	213	St Louis	EA		SWB	CCI	520	501
314	220	Kirkwood	EA		SWB	CCI	520	Ladue
314	215	St Louis	EA		SWB	CCI	520	501
314	216	St Louis	EA		SWB	CCI	520	501
314	218	St Louis	EA		SWB	CCI	520	501
314	219	St Louis	EA		SWB	CCI	520	501
314	250	Orchard Farm	EA		SWB	CCI	520	501
314	256	Manchester	EA		SWB	CCI	520	Ladue
314	310	Harvester	EA		SWB	CCI	520	Ladue
314	301	St Louis	EA		SWB	CCI	520	501
314	289	Jefferson STL	EA		SWB	CCI	520	501
314	291	Bridgeton	EA		SWB	CCI	520	Ladue
314	296	Maxville	EA		SWB	CCI	520	501
314	298	Bridgeton	EA		SWB	CCI	520	Ladue
314	303	Ladue	EA		SWB	CCI	520	Ladue
314	302	Ladue	EA		SWB	CCI	520	Ladue
314	286	St Louis	EA		SWB	CCI	520	501
314	304	Ladue	EA		SWB	CCI	520	Ladue
314	305	Fenton	EA		SWB	CCI	520	501
314	306	Ladue	EA		SWB	CCI	520	Ladue
314	307	Ladue	EA		SWB	CCI	520	Ladue
314	287	Maxville	EA		SWB	CCI	520	501
314	284	St Louis	EA		SWB	CCI	520	501
314	285	Cedar Hill	EA		SWB	CCI	520	501
314	257	Pacific	EA		SWB	CCI	520	501
314	263	Evergreen STL	EA		SWB	CCI	520	Ladue
314	258	Orchard Farm	EA		SWB	CCI	520	501
314	259	Chestnut STL	EA		SWB	CCI	520	501
314	260	Evergreen STL	EA		SWB	CCI	520	Ladue
314	261	Evergreen STL	EA		SWB	CCI	520	501
314	271	Pacific	EA		SWB	CCI	520	501
314	268	Chestnut STL	EA		SWB	CCI	520	501
314	282	Maxville	EA		SWB	CCI	520	501
314	273	Pond	EA		SWB	CCI	520	Ladue
314	274	Cedar Hill	EA		SWB	CCI	520	501
314	275	Creve Coeur	EA		SWB	CCI	520	Ladue
314	277	St Louis	EA		SWB	CCI	520	501
314	425	Chestnut STL	EA		SWB	CCI	520	501
314	416	Mehlville	EA		SWB	CCI	520	501
314	427	Overland	EA		SWB	CCI	520	Ladue

NPA	NXX	CITY	TYPE	EA	TELCO	0+	LATA	1+ TANDEM
314	575	Creve Coeur	EA		SWB	CCI	520	Ladue
314	570	St Louis	EA		SWB	CCI	520	501
314	571	Flanders STL	EA		SWB	CCI	520	501
314	572	Parkview STL	EA		SWB	CCI	520	501
314	574	St Louis	EA		SWB	CCI	520	501
314	577	Prospect STL	EA		SWB	CCI	520	501
314	576	Creve Coeur	EA		SWB	CCI	520	Ladue
314	567	Ladue	EA		SWB	CCI	520	Ladue
314	578	St Louis	EA		SWB	CCI	520	501
314	579	Creve Coeur	EA		SWB	CCI	520	Ladue
314	580	Chestnut STL	EA		SWB	CCI	520	501
314	582	Creve Coeur	EA		SWB	CCI	520	Ladue
314	569	Ladue	EA		SWB	CCI	520	Ladue
314	560	St Louis	EA		SWB	CCI	520	501
314	565	St Louis	EA		SWB	CCI	520	501
314	586	De Soto	EA		SWB	CCI	520	501
314	544	Melrose STL	EA		SWB	CCI	520	501
314	539	Chestnut STL	EA		SWB	CCI	520	501
314	540	St Louis	EA		SWB	CCI	520	501
314	541	St Louis	EA		SWB	CCI	520	501
314	542	Creve Coeur	EA		SWB	CCI	520	Ladue
314	550	St Louis	EA		SWB	CCI	520	501
314	544	St Louis	EA		SWB	CCI	520	501
314	559	St Louis	EA		SWB	CCI	520	501
314	428	Overland	EA		SWB	CCI	520	Ladue
314	552	St Louis	EA		SWB	CCI	520	501
314	553	Evergreen STL	EA		SWB	CCI	520	501
314	554	Chestnut STL	EA		SWB	CCI	520	501
314	583	Union	EA		SWB	CCI	520	501
314	588	St Louis	EA		SWB	CCI	520	501
314	587	Eureka	EA		SWB	CCI	520	Ladue
314	537	Chesterfield	EA		SWB	CCI	520	Ladue
314	629	St Clair	EA		SWB	CCI	520	501
314	617	St Louis	EA		SWB	CCI	520	501
314	621	Chestnut STL	EA		SWB	CCI	520	501
314	622	Chestnut STL	EA		SWB	CCI	520	501
314	623	St Louis	EA		SWB	CCI	520	501
314	631	Melrose STL	EA		SWB	CCI	520	501
314	630	St Louis	EA		SWB	CCI	520	501
314	615	St Louis	EA		SWB	CCI	520	501
314	632	St Louis	EA		SWB	CCI	520	501
314	638	Melrose STL	EA		SWB	CCI	520	501
314	640	St Louis	EA		SWB	CCI	520	501
314	644	Mission STL	EA		SWB	CCI	520	501
314	616	St Louis	EA		SWB	CCI	520	501

NPA	NXX	CITY	TYPE	EA	TELCO	0+	LATA	1+ TANDEM
314	612	St Louis	EA		SWB	CCI	520	501
314	613	St Louis	EA		SWB	CCI	520	501
314	589	St Louis	EA		SWB	CCI	520	501
314	602	Kirkwood	EA		SWB	CCI	520	Ladue
314	591	Ladue	EA		SWB	CCI	520	Ladue
314	592	Ferguson	EA		SWB	CCI	520	Ladue
314	595	Ferguson	EA		SWB	CCI	520	Ladue
314	601	St Louis	EA		SWB	CCI	520	501
314	604	Kirkwood	EA		SWB	CCI	520	Ladue
314	603	Kirkwood	EA		SWB	CCI	520	Ladue
314	610	Ladue	EA		SWB	CCI	520	Ladue
314	606	Kirkwood	EA		SWB	CCI	520	Ladue
314	607	Kirkwood	EA		SWB	CCI	520	Ladue
314	608	Kirkwood	EA		SWB	CCI	520	Ladue
314	609	Kirkwood	EA		SWB	CCI	520	Ladue
314	538	Overland	EA		SWB	CCI	520	Ladue
314	551	Bridgeton	EA		SWB	CCI	520	Ladue
314	536	Chesterfield	EA		SWB	CCI	520	Ladue
314	466	St Louis	EA		SWB	CCI	520	501
314	460	St Louis	EA		SWB	CCI	520	501
314	461	Imperial	EA		SWB	CCI	520	501
314	464	Imperial	EA		SWB	CCI	520	501
314	535	Jefferson STL	EA		SWB	CCI	520	501
314	469	Creve Coeur	EA		SWB	CCI	520	Ladue
314	467	Imperial	EA		SWB	CCI	520	501
314	454	Forest STL	EA		SWB	CCI	520	501
314	475	Hercul Pev	EA		SWB	CCI	520	501
314	476	Harvester	EA		SWB	CCI	520	Ladue
314	477	Harvester	EA		SWB	CCI	520	Ladue
314	479	Hercul Pev	EA		SWB	CCI	520	501
314	458	Pond.	EA		SWB	CCI	520	Ladue
314	452	Ware	EA		SWB	CCI	520	501
314	453	Creve Coeur	EA		SWB	CCI	520	Ladue
314	487	Mehlville	EA		SWB	CCI	520	501
314	435	St Louis	EA		SWB	CCI	520	501
314	429	Overland	EA		SWB	CCI	520	Ladue
314	430	St Louis	EA		SWB	CCI	520	Ladue
314	432	Ladue	EA		SWB	CCI	520	Ladue
314	434	Creve Coeur	EA		SWB	CCI	520	Ladue
314	440	St Louis	EA		SWB	CCI	520	501
314	436	Chestnut STL	EA		SWB	CCI	520	501
314	451	Graysummit	EA		SWB	CCI	520	Ladue
314	441	Harvester	EA		SWB	CCI	520	Ladue
314	442	Harvester	EA		SWB	CCI	520	Ladue
314	444	Chestnut STL	EA		SWB	CCI	520	501

NPA	NXX	CITY	TYPE	EA	TELCO	0+	LATA	1+ TANDEM
314	447	Harvester	EA		SWB	CCI	520	Ladue
314	481	St Louis	EA		SWB	CCI	520	501
314	465	St Louis	EA		SWB	CCI	520	501
314	489	St Louis	EA		SWB	CCI	520	Ladue
314	527	Manchester	EA		SWB	CCI	520	Ladue
314	522	Ferguson	EA		SWB	CCI	520	Ladue
314	523	Creve Coeur	EA		SWB	CCI	520	Ladue
314	524	Ferguson	EA		SWB	CCI	520	Ladue
314	525	Sappington	EA		SWB	CCI	520	501
314	490	Overland	EA		SWB	CCI	520	Ladue
314	529	Chesterfield	EA		SWB	CCI	520	Ladue
314	520	St Louis	EA		SWB	CCI	520	501
314	531	Jefferson STL	EA		SWB	CCI	520	501
314	532	Chesterfield	EA		SWB	CCI	520	Ladue
314	533	Jefferson STL	EA		SWB	CCI	520	501
314	534	Jefferson STL	EA		SWB	CCI	520	501
314	521	Ferguson	EA		SWB	CCI	520	Ladue
314	530	Chesterfield	EA		SWB	CCI	520	Ladue
314	519	Chesterfield	EA		SWB	CCI	520	Ladue
314	516	St Louis	EA		SWB	CCI	520	501
314	507	Ladue	EA		SWB	CCI	520	Ladue
314	515	St Louis	EA		SWB	CCI	520	501
314	491	Overland	EA		SWB	CCI	520	Ladue
314	503	Ladue	EA		SWB	CCI	520	Ladue
314	505	St Louis	EA		SWB	CCI	520	501
314	506	Ferguson	EA		SWB	CCI	520	Ladue
314	504	Ladue	EA		SWB	CCI	520	Ladue
314	508	St Louis	EA		SWB	CCI	520	501
314	514	Creve Coeur	EA		SWB	CCI	520	Ladue
314	509	St Louis	EA		SWB	CCI	520	501
314	510	St Louis	EA		SWB	CCI	520	501
314	512	St Louis	EA		SWB	CCI	520	501

NPA	NXX	CITY	TYPE	EA	TELCO	0+	LATA	1+ TANDEM
573	738	Senath	EA		SWB	CCI	520	Sikeston
573	333	Caruthersville	EA		SWB	CCI	520	Sikeston
573	748	New Madrid	EA		SWB	CCI	520	Sikeston
573	225	Cape Girardeau	EA		SWB	CCI	520	Sikeston
573	754	Louisiana	EA		SWB	CCI	520	501
573	756	Farmington	EA		SWB	CCI	520	501
573	757	Deering	EA		SWB	CCI	520	Sikeston
573	332	Cape Girardeau	EA		SWB	CCI	520	Sikeston
573	760	Farmington	EA		SWB	CCI	520	501
573	267	Center	EA		SWB	CCI	520	501
573	737	Hornersville	EA		SWB	CCI	520	Sikeston
573	450	Cape Girardeau	EA		SWB	CCI	520	Sikeston
573	334	Cape Girardeau	EA		SWB	CCI	520	Sikeston
573	734	Bismark	EA		SWB	CCI	520	501
573	718	Poplar Buff	EA		SWB	CCI	520	Sikeston
573	339	Cape Girardeau	EA		SWB	CCI	520	Sikeston
573	448	Gideon	EA		SWB	CCI	520	Sikeston
573	701	Farmington	EA		SWB	CCI	520	501
573	701	Farmington	EA		SWB	CCI	520	501
573	708	Fredericktown	EA		SWB	CCI	520	501
573	717	Kennett	EA		SWB	CCI	520	Sikeston
573	718	Poplar Bluff	EA		SWB	CCI	520	Sikeston
573	733	Bell City	EA		SWB	CCI	520	Sikeston
573	720	Blytheville	EA		SWB	CCI	520	Sikeston
573	722	Advance	EA		SWB	CCI	520	Sikeston
573	964	Lk Ozark Beach	EA		SWB	CCI	520	501
573	730	Cape Girardeau	EA		SWB	CCI	520	Sikeston
573	335	Cape Girardeau	EA		SWB	CCI	520	Sikeston
573	220	Fulton	EA		SWB	CCI	520	501
573	934	Fredericktown	EA		SWB	CCI	520	501
573	776	Poplar Bluff	EA		SWB	CCI	520	Sikeston
573	328	Qulin	EA		SWB	CCI	520	Sikeston
573	280	Lk Ozark Beach	EA		SWB	CCI	520	501
573	847	Paynesville	EA		SWB	CCI	520	501
573	222	Puxico	EA		SWB	CCI	520	Sikeston
573	221	Hannibal	EA		SWB	CCI	520	501
573	290	Cape Girardeau	EA		SWB	CCI	520	Sikeston
573	283	Essex	EA		SWB	CCI	520	Sikeston
573	866	Patton	EA		SWB	CCI	520	Sikeston
573	833	Pocahontas	EA		SWB	CCI	520	Sikeston
573	873	Camdenton	EA		SWB	CCI	520	501
573	880	Ste Genevieve	EA		SWB	CCI	520	501
573	883	Ste Genevieve	EA		SWB	CCI	520	501
573	276	Malden	EA		SWB	CCI	520	Sikeston
573	887	Chaffee	EA		SWB	CCI	520	Sikeston

NPA	NXX	CITY	TYPE	EA	TELCO	0+	LATA	1+ TANDEM
573	840	Poplar Bluff	EA		SWB	CCI	520	Sikeston
573	824	AltenburgFrohna	EA		SWB	CCI	520	Sikeston
573	324	Bowling Green	EA		SWB	CCI	520	501
573	783	Fredericktown	EA		SWB	CCI	520	501
573	317	Camdenton	EA		SWB	CCI	520	501
573	270	Cape Girardeau	EA		SWB	CCI	520	Sikeston
573	345	Climax Springs	EA		SWB	CCI	520	501
573	778	Poplar Bluff	EA		SWB	CCI	520	Sikeston
573	271	Cape Girardeau	EA		SWB	CCI	520	Sikeston
573	784	Frankford	EA		SWB	CCI	520	501
573	820	Dexter	EA		SWB	CCI	520	Sikeston
573	785	Poplar Bluff	EA		SWB	CCI	520	Sikeston
573	788	Old Appleton	EA		SWB	CCI	520	Sikeston
573	792	Holcomb	EA		SWB	CCI	520	Sikeston
573	302	Lk Ozark Beach	EA		SWB	CCI	520	501
573	794	Delta	EA		SWB	CCI	520	Sikeston
573	967	Fisk	EA		SWB	CCI	520	Sikeston
573	684	Wellsville	EA		SWB	CCI	520	501
573	688	Lilbourn	EA		SWB	CCI	520	Sikeston
573	686	Poplar Bluff	EA		SWB	CCI	520	Sikeston
573	547	Perryville	EA		SWB	CCI	520	Sikeston
573	517	Perryville	EA		SWB	CCI	520	Sikeston
573	518	Flat River	EA		SWB	CCI	520	501
573	543	St Mary	EA		SWB	CCI	520	Sikeston
573	545	Benton	EA		SWB	CCI	520	Sikeston
573	392	Eldon	EA		SWB	CCI	520	501
573	562	Leadwood	EA		SWB	CCI	520	501
573	242	Clarksville	EA		SWB	CCI	520	501
573	396	Risco	EA		SWB	CCI	520	Sikeston
573	986	Cape Girardeau	EA		SWB	CCI	520	Sikeston
573	564	Montgmrncy	EA		SWB	CCI	520	501
573	248	Hannibal	EA		SWB	CCI	520	501
573	568	Bloomfield	EA		SWB	CCI	520	Sikeston
573	581	Mexico	EA		SWB	CCI	520	501
573	513	Perryville	EA		SWB	CCI	520	Sikeston
573	243	Jackson	EA		SWB	CCI	520	Sikeston
573	380	Sikeston	EA		SWB	CCI	520	Sikeston
573	471	Sikeston	EA		SWB	CCI	520	Sikeston
573	444	Fredericktown	EA		SWB	CCI	520	501
573	204	Jackson	EA		SWB	CCI	520	501
573	264	Scott City	EA		SWB	CCI	520	Sikeston
573	431	Flat River	EA		SWB	CCI	520	501
573	470	Bowling Green	EA		SWB	CCI	520	501
573	473	Mexico	EA		SWB	CCI	520	501
573	472	Sikeston	EA		SWB	CCI	520	Sikeston

NPA	NXX	CITY	TYPE	EA	TELCO	0+	LATA	1+ TANDEM
573	246	Campbell	EA		SWB	CCI	520	Sikeston
573	480	Lk Ozark Beach	EA		SWB	CCI	520	501
573	483	Bloomsdale	EA		SWB	CCI	520	501
573	484	Beaufort	EA		SWB	CCI	520	501
573	414	Fredericktown	EA		SWB	CCI	520	501
573	406	Hannibal	EA		SWB	CCI	520	501
573	582	Mexico	EA		SWB	CCI	520	501
573	592	Fulton	EA		SWB	CCI	520	501
573	590	Fulton	EA		SWB	CCI	520	501
573	346	Camdenton	EA		SWB	CCI	520	501
573	667	Morehouse	EA		SWB	CCI	520	Sikeston
573	651	Cape Girardeau	EA		SWB	CCI	520	Sikeston
573	654	Cardwell	EA		SWB	CCI	520	Sikeston
573	979	Cape Girardeau	EA		SWB	CCI	520	Sikeston
573	363	Macks Creek	EA		SWB	CCI	520	501
573	359	Hayti	EA		SWB	CCI	520	Sikeston
573	348	Eldon	EA		SWB	CCI	520	501
573	358	Bonnetterre	EA		SWB	CCI	520	501
573	365	Eldon	EA		SWB	CCI	520	501
573	347	Climax Springs	EA		SWB	CCI	520	501
573	675	Wyatt	EA		SWB	CCI	520	Sikeston
573	678	Richwoods	EA		SWB	CCI	520	501
573	683	Charleston	EA		SWB	CCI	520	Sikeston
573	898	Elsberry	EA		SWB	CCI	520	501
573	649	East Prairie	EA		SWB	CCI	520	Sikeston
573	266	Oak Ridge	EA		SWB	CCI	520	Sikeston
573	238	Marble Hill	EA		SWB	CCI	520	Sikeston
573	621	Sikeston	EA		SWB	CCI	520	Sikeston
573	379	Portageville	EA		SWB	CCI	520	Sikeston
573	262	Oran	EA		SWB	CCI	520	Sikeston
573	378	Versailles	EA		SWB	CCI	520	501
573	614	Dexter	EA		SWB	CCI	520	Sikeston
573	620	Sikeston	EA		SWB	CCI	520	Sikeston
573	249	Farber	EA		SWB	CCI	520	501
573	624	Dexter	EA		SWB	CCI	520	Sikeston
573	643	Marston	EA		SWB	CCI	520	Sikeston
573	374	Gravois Mills	EA		SWB	CCI	520	501
573	628	Wardell	EA		SWB	CCI	520	Sikeston
573	372	Gravois Mills	EA		SWB	CCI	520	501
573	369	Tuscumbia	EA		SWB	CCI	520	501
573	642	Fulton	EA		SWB	CCI	520	501
573	888	Kennett	EA		SWB	CCI	520	Sikeston

A/C	NXX		TYPE	EA DATE	TELCO	LATA	TANDEM
573	897	Linn	EA		SWB	521	Jeff City
573	477	St Thomas			SWB	521	Jeff City
573	422	Vienna	EA		SWB	521	Jeff City
573	722	Westphalia	EA		SWB	521	Jeff City
573	229	Meta	EA		SWB	521	Jeff City
573	744	Freeburg	EA		SWB	521	Jeff City
573	455	Westphalia			SWB	521	Jeff City

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SEP 30 1998

COMMISSION COUNSEL
PUBLIC SERVICE COMMISSION