

Paul G. Lane
General Counsel-
Missouri

Southwestern Bell Telephone
One Bell Center, Room 3520
St. Louis, Missouri 63101
Phone 314 235-4300
Fax 314 247-0014



FILED

January 19 1999

JAN 19 1999

The Honorable Dale Hardy Roberts
Secretary/Chief Regulatory Law Judge
Missouri Public Service Commission
301 West High Street, Floor 5A
Jefferson City, Missouri 65101

Missouri Public
Service Commission

Re: Case No. T0-99-227

Dear Judge Roberts:

Enclosed, for filing in the above-captioned case, are an original and fourteen copies of Response of Southwestern Bell Telephone Company to the Telecommunications Resellers Association's Request for Reconsideration.

Thank you for bringing this matter to the attention of the Commission.

Very truly yours,

Paul G. Lane /tm

Paul G. Lane

Enclosures

cc: All Attorneys of Record

BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI

FILED
JAN 19 1999
Missouri Public
Service Commission

Application of Southwestern Bell Telephone)
Company to Provide Notice of Intent to File)
an Application for Authorization to Provide)
In-Region InterLATA Services Originating)
in Missouri Pursuant to Section 271 of the)
Telecommunications Act of 1996)

Case No. TO-99-227

**RESPONSE OF SOUTHWESTERN BELL TELEPHONE COMPANY TO THE
TELECOMMUNICATIONS RESELLERS ASSOCIATION'S REQUEST FOR
RECONSIDERATION**

COMES NOW Southwestern Bell Telephone Company (SWBT) and for its
Response to the Telecommunications Resellers Association's (TRA's) Request for
Reconsideration, states as follows:

1. In its December 30, 1998, Order Granting Interventions and Modifying
Procedural Schedule in this case, the Missouri Public Service Commission (Commission)
denied TRA's Application to Intervene, due to TRA's failure to comply with the
Commission's Rule 4 CSR 240-2.075(3), which requires an association seeking
intervention to list the names of its members. However, the Commission granted TRA an
additional ten (10) days to "cure" its application to intervene by filing the names of their
members, and request that the Commission reconsider its application.

2. TRA has not filed the names of its members and has therefore not "cured"
its noncompliance with 4 CSR 240-2.075(3). However, on January 12, 1999, TRA filed
a Request for Reconsideration in which it asks that the Commission allow it to merely
"participate without intervention" in this proceeding. TRA asserts that a participant

without intervention need not identify its members pursuant to 240-2.075(3). TRA does not, however address 4 CSR 2.075(5)(A) which requires that participants without intervention must make a full disclosure of their interests in the proceeding. TRA does not explain how it can make a full disclosure of its interests if it refuses to identify its members.

3. TRA states that it has determined that "its interest in this matter is limited to monitoring the proceedings and filing a post-hearing brief." If TRA only wishes to monitor this proceeding and file a post-hearing brief, SWBT does not object to TRA's request to participate in this proceeding without intervention. If, however, TRA intends to participate more actively in this proceeding, for example, by submitting testimony or cross-examining any witnesses, SWBT believes the Commission must require TRA to comply with 4 CSR 240-2.075(5), including requiring TRA to identify its members and disclose the position it intends to take in this case.

Respectfully submitted,

SOUTHWESTERN BELL TELEPHONE COMPANY

By Paul G. Lane /tm
PAUL G. LANE #27011
LEO J. BUB #34326
ANTHONY K. CONROY #35199
KATHERINE C. SWALLER #34271
Attorneys for Southwestern Bell Telephone Company
One Bell Center, Room 3520
St. Louis, Missouri 63101
(314)235-4300 (Telephone)
(314)247-0014 (Facsimile)

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing Response of Southwestern Bell Telephone Company to the Telecommunications Resellers Association's Request for Reconsideration was served by first-class, postage prepaid U.S. Mail, on all parties on the attached service list this 19th day of January, 1999.

Paul G. Lane /tm

MARTHA HOGERTY
OFFICE OF THE PUBLIC COUNSEL
301 WEST HIGH STREET, SUITE 250
JEFFERSON CITY, MO 65101

PENNY G. BAKER
DAVID J. STUEVEN
MISSOURI PUBLIC SERVICE COMMISSION
301 WEST HIGH STREET, SUITE 530
JEFFERSON CITY, MO 65101

PAUL S. DEFORD
LATHROP & GAGE
2345 GRAND BLVD, SUITE 2500
KANSAS CITY, MO 64108

TRACY D. PAGLIARA
GTE SERVICE CORPORATION
601 MONROE STREET, SUITE 304
JEFFERSON CITY, MO 65101-3202

EDWARD J. CADIEUX
ONE BROOKS CENTER PARKWAY
4TH FLOOR
TOWN & COUNTRY, MO 63017

CRAIG S. JOHNSON
ANDERECK, EVANS, MILNE,
PEACE & BAUMHOER
305 EAST MCCARTY
P.O. BOX 1438
JEFFERSON CITY, MO 65102

W. R. ENGLAND, III
BRYDON, SWEARENGEN & ENGLAND
312 EAST CAPITOL
P.O. BOX 456
JEFFERSON CITY, MO 65101

LINDA K. GARDNER
UNITED TELEPHONE COMPANY OF
MISSOURI
5454 W 110TH STREET
OVERLAND PARK, KS 66211

CARL J. LUMLEY
LELAND B. CURTIS
CURTIS, OETTING, HEINZ, GARRETT
& SOULE, P.C.
130 S. BEMISTON, SUITE 200
CLAYTON, MISSOURI 63105

PAUL H. GARDNER
GOLLER, GARDNER & FEATHER
131 E. HIGH STREET
JEFFERSON CITY, MO 65101

KENNETH A. SCHIFMAN
JULIE GRIMALDI
SPRINT COMMUNICATIONS COMPANY
8140 WARD PARKWAY
KANSAS CITY, MO 64114

MR. JAMES M. FISCHER
101 W. MCCARTY, SUITE 215
JEFFERSON CITY, MO 65101

MARK W. COMLEY
NEWMAN, COMLEY & RUTH P.C.
601 MONROE, SUITE 301
P.O. BOX 537
JEFFERSON CITY, MO 65102

MARY ANN YOUNG
WILLIAM D. STEINMEIER
P.O. BOX 10459
JEFFERSON CITY, MO 65102

THOMAS C. PELTO
AT&T COMMUNICATIONS OF THE
SOUTHWEST, INC.
919 CONGRESS AVE., SUITE 1500
AUSTIN, TX 78701-2444

DOUGLAS W. TRABARIS
ELIZABETH HOWLAND
TELEPORT COMMUNICAITONS GROUP
233 S. WACKER DR, SUITE 2100
CHICAGO, IL 60606

ANDREW O. ISAR
TELECOMMUNICATIONS RELLEERS
ASSOCIATION
4312 92ND AVE., N.W.
P.O. BOX 2461
GIG HARBOR, WA 98335

CHARLES W. MCKEE
SPRINT PSC
4900 MAIN, 12TH FLOOR
KANSAS CITY, MO 64112

DIAL US
333 PARK CENTRAL E
SUITE 926
SPRINGFIELD, MO 65806

DIGITAL TELEPORT, INC.
11111 DORSETT ROAD
ST. LOUIS, MO 63043

DOBSON WIRELESS, INC.
13439 N. BROADWAY EXT., SUITE 200
OKLAHOMA CITY, OK 73114

EXCEL TELECOMMUNICATIONS
SYSTEMS, INC.
8750 N. CENTRAL EXPRESSWAY
BOX #6
DALLAS, TX 75231

EXOP OF MISSOURI, INC.
402 A E. BANNISTER RD
KANSAS CITY, MO 64131

EZ TALK COMMUNICAITONS LLC
4727 SOUTH MAIN
STAFFORD, TX 77477

FAST CONNECTIONS, INC.
PO BOX 130418
DALLAS, TX 75313

FRONTIER TELEMAGEMENT INC.
180 S CLINTON
ROCHESTER, NY 14646

GE EXCHANGE
6540 POWER FERRY ROAD
ATLANTA, GA 30339

GROUP LONG DISTANCE, INC.
6455 E JOHNS CROSSING, SUITE 285
DULUTH, GA 30097

ROBERT MOLteni
JEREMIAH W. NIXON
ATTORNEY GENERAL OF MISSOURI
P.O. BOX 899
JEFFERSON CITY, MO 65102

ICG TELECOM GROUP, INC.
161 INVERNESS DRIVE WEST
ENGLEWOOD, CO 80112

INTERMEDIA COMMUNICAITONS INC
3625 QUEEN PALM DR
TAMPA, FL 33619

LCI INTERNATIONAL TELECOM CORP
D/B/A/ QWST COMMUNICATIONS SERVICES
4250 N FAIRFAX DR, SUITE 12W055
ARLINGTON, VA 22203

LDD, INC.
24 SOUTH MINNESOTA
APE GIRARDEAU, MO 63701

LDM SYSTEMS, INC
254 S MAIN ST
NEW, NY 10956

LOCAL FONE SERVICE, INC.
624 SIX FLAGS DRIVE, SUITE 214
ARLINGTON, TX 76011

LOCAL LINE AMERICA, INC.
2680 STATE RD
CUYAHOGA FALLS, OH 44223

MARK TWAIN COMMUNICAITONS CO
PO BOX 128
HURDLAND, MO 63547

MAXCOM, INC
10647 WIDMER RD
LENEXA, KA 66215

AMERICAN COMMUNICAITONS SERVICES
OF KANSAS CITY INC.
131 NATIONAL BUSINESS PARKWAY
SUITE 100
ANNAPOLIC JUNCITON, MD 20702

MAX-TEL COMMUNICAITONS INC
102 W. FRANKLIN
ALVORD, TX 76225

BTI
4300 SIX FORKS RD.,S UITE 400
RALEIGH, NC 27609

MCLEODUSA TELECOMMUNICATIONS
SERVICES
6400 C STREET SW
CEDAR RAPIDS, IA 52406

MEGSINET-CLE, INC
225 W OHIO, SUITE 200
CHICAGO, IL 60610

MFS INTELENET OF MISSOURI, INC.
1705 S. CAPITAL OF TEXAS HIGHWAY
J SUITE 100
AUSTIN, TX 78746

MICOMM SERVICES, INC.
4001 MCEWEN DR, SUITE 200
DALLAS, TX 75244

MICROWAVE SERVICES, INC.
3 BALA PALZA EAST, SUITE 502
BALA CYNWYD, PA 19004

MIDWESTERN TEL
3809 CASTELMAN AVE, SUITE 100
ST. LOUIS, MO 63110

MILLER TELEPHONE CO
209 E MAIN
MILLER, MO 65707

MISSOURI COMM SOUTH, INC
101 RANDOL MILL, SUITE 108
ARLINGTON, TX 76011

NAVIGATOR TELECOMMUNICATIONS, LLC
212 CENTER ST., SUITE 1100
LITTLE ROCK, AR 72201

NOW COMMUNICATIONS, INC
713 COUNTRY PLACE DRIVE
JACKSON, MS 39208-6619

PREFERRED CARRIER SERVICES, INC.
500 GRAPEVINE HWY, SUITE 300
HURST, TX 76054

QCC, INC
8829 BOND STREET
OVERLAND PARK, KS 66214

OMNIPLEX COMMUNICAITONS
743 SPRINT 40 PARK, SUITE 250
CHESTERFIELD, MO 63005

QUINTELCO, INC
1 BLUE HILL PLAZA
PEARL RIVER, NY 10965

RECONNEX
9620 S.W. BARUR BLVD, SUITE 330
PORTLAND, OR 97219

REN-TEL COMMUNICATIONS, INC.
85 PINE HAVEN DR
CARROLLTON, GA 30116

SURETEL, INC.
5 NORTH MCCORMICK
OKLAHOMA CITY, OK 73127

TCG ST. LOUIS
233 S WACKER DR, SUITE 2100
CHICAGO, IL 60606

TEL-LINK, LLC
1001 THIRD AVENUE WEST, USITE 354
BRANDENTON, FL 34205

TEL-SAVE, INCORPORATED OF
PENNSYLVANIA
6805 ROUTE 202
NEW HOPE, PA 18938

TELIGENT, INC.
8065 LEESBURG PIKE
SUITE 400
VIENNA, VA 22182

THE CUBE
1063 WIRT ROAD
SUITE 202
HOUSTON, TX 77005

TANSAMERICAN TELEPHONE
209 E UNIVERSITY
DANTON, TX 76201

U.S. TELCO, INC.
1600 PACIFIC AVENUE #2700
DALLAS, TX 75201-3565

USLD COMMUNICAITONS, INC.
4250 NORTH FAIRFAX DR., 12W002
ARLINGTON, VA 22203

USN COMMUNICATIONS SOUTHWEST, INC.
10 S. RIVERSIDE PLAZA
SUITE 401
CHICAGO, IL 60606

WINSTAR WIRELESS OF MISSOURI, INC.
7799 LEESBURG PIKE
SUITE 401 S
TYSONS CORNER, VA 22043

WORLDCOM TECHNOLOGIES
1705 S CAPITAL OF HEXAS HWY
SUITE 100
AUSTIN, TX 78746

Z-TEL COMMUNICAITONS, INC.
777 S. HARBOUR ISLAND BLVD
SUITE 990
TAMPA, FL 33602

COMCAST TELECOMMUNICATIONS, INC.
D/B/A/ COMCAST LONG DISTANCE
211 SOUTH GULPH RD
KING OF PRUSSIA, PA 19406

MISSOURI CSI CORP
12835 E ARAPAHOE ROAD
5TH FLOOR
ENGLEWOOD, CO 80112

TDS ENGINEER, LLC
229 E FOURTH ST
PO BOX 297
CARTHAGE, MO 64836

ACI CORP
7337 S REVERE PARKWAY
ENGLEWOOD, CO 80112

KARL ZOBRIST
BLACKWELL SANDERS PEPER MARTIN
TWO PERSHING SQUARE
2300 MAIN STREET
KANSAS CITY, MO 64108

BARTEL COMMUNICATIONS, INC.
14 CLIF-SIDE
GLENDALE, MO 63122

CAMARATO DISTRIBUTING, INC
900 CAMARATO DR
HERRIN, IL 62948

CHOCTAW COMMUNICAITONS, LC
D/B/A/ SMOKE SIGNAL COMMUNICAITONS
8400 S GESSNER
HOUSTON, TX 77074

DIAL & SAVE OF MISSOURI, INC
8750 N CENTRAL EXPRESSWAY
SUITE 1500
DALLAS, TX 75231

GABRIEL COMMUNICATIONS OF
MISSOURI, INC
16650 CHESTERFIELD GROVE RD
SUITE 110
CHESTERFIELD, MO 63005

ANDY DALTON
CITY UTILITIES OF SPRINGFIELD
P.O. BOX 551
SPRINGFIELD, MO 65801-0551

JATO COMMUNICAITONS CORP
5660 GREENWOOD PLAZA BLVD
SUITE 220
ENGLEWOOD, CO 80111

LEVEL 3 COMMUNICAITONS, LLC
1450 INFINITE DRIVE
LOUISVILLE, CO 80027

NEX-TEL CORPORATION
3050 K STREET, N.W., SUITE 250
WASHINGTON, DC 20007

THE PAGER COMPANY
5321 E 9TH ST
KANSAS CITY, MO 64124

SIMPLY LOCAL SERVICES, INC.
11406 GRAVOIS ROAD, SUITE 100
ST. LOUIS, MO 63126

SUPRA TELECOMMUNICAITONS &
INFORMATION SYSTEMS, INC.
2620 S.W. 27TH AVE
MIAMI, FL 33133

TRANSWIRE MISSOURI OPERATIONS,
LLC
8 W 19TH STREET
NEW YORK, NY 10011

UNITED STATES TELECOMMUNICAITONS INC.
D/B/A/ TEL COM PLUS
13902 N. DALE MABRY
SUITE 212
TAMPA, FL 33618

UNIVERSAL TELEPHONE
2611 E. HARRY
WICHITA, KS 67211

AMERITECH COMMUNICATIONS
INTERNATIONAL
9525 W RYN MAWR
SUITE 600
ROSEMONT, IL 60018

AT&T COMMUNICAITONS OF THE
SOUTHWEST, INC
101 W MCCARTY
SUITE 216
JEFFERSON CITY, MO 65101

ATLAS COMMUNICAITONS, LTD
482 NORRISTOWN RD
SUITE 200
BLUE Bell, PA 19422

BELLSOUTH BSE, INC
2727 PACES FERRY RD
ATLANTA, GA 30339

BIRCH TELCOM OF MISSOURI, INC.
1004 BALTIMORE AVE
SUITE 900
KANSAS CITY, MO 64105