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January 19, 2001

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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-99-593

Dear Mr. Roberts:

Enclosed for filing in the above-captioned case are an original and eight (8) conformed copies of the **STAFF'S STATEMENT OF POSITIONS ON THE ISSUES**.

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
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KRK/lb
Enclosure
cc: Counsel of Record

**BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI**

In the Matter of the Investigation into)
Signaling Protocols, Call Records, Trunk)
Arrangements and Traffic Measurement)

Case No. TO-99-593

STAFF'S STATEMENT OF POSITIONS ON THE ISSUES

COMES NOW the Staff of the Missouri Public Service Commission ("Staff"), and for its Statement of Positions on the Issues, states to the Missouri Public Service Commission ("Commission") as follows:

Issue No. 1 – Signaling Protocols: Is it necessary for the Commission to decide in this case what signaling protocols should be utilized for intrastate intraLATA traffic terminating over the common trunks between the former PTCs and the former SCs?

Staff's Position: No, it is not necessary.

Issue No. 2 – Traffic Measurement: How and where should intrastate intraLATA traffic terminating over the common trunks between the former PTCs and the former SCs be measured for purposes of terminating compensation?

Staff's Position: The Staff does not oppose measurement of traffic at any point, but rather encourages measurement at multiple points, in order to provide additional data, which may be useful if billing disputes subsequently arise.

Issue No. 3 – Call Records: What call records should be utilized for intrastate intraLATA traffic terminating over the common trunks between the former PTCs and the former SCs?

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Staff's Position: No position.

Issue No. 4 – Trunking Arrangements: What changes, if any, should be made to the existing common trunking arrangements between the former PTCs and the former SCs?

Staff's Position: No position.

Issue No. 5 – Business Relationships: What business relationship should be utilized for payment for intrastate intraLATA traffic terminating over the common trunks between the former PTCs and the former SCs?

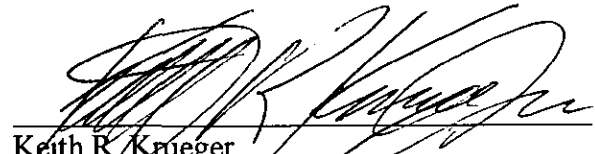
Staff's Position: The Staff does not oppose any changes that these companies may agree to make with respect to their business relationships with one another. The Commission does not regulate the business relationships between companies. When the Commission ordered, in its Report and Order in Case No. TO-99-254, that this case be established, it did not identify business relationships as an issue that the parties should address in this case.

Issue No. 6 – Call Blocking: What procedure or arrangement, if any, should be utilized to prevent noncompensated intrastate intraLATA traffic from continuing to terminate over the common trunks between the former PTCs and the former SCs?

Staff's Position: The blocking of telephone calls is a drastic action, which has significant impacts upon the customers of the regulated companies, and the companies should not take such an action unless they first obtain a specific order from the Commission authorizing them to do so.

Respectfully submitted,

DANA K. JOYCE
General Counsel

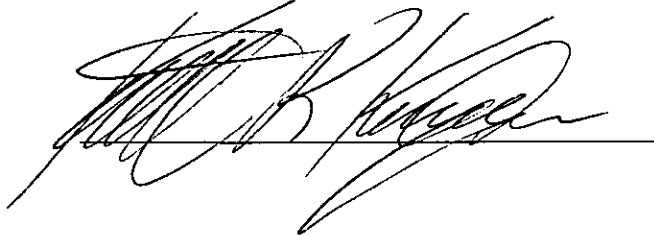


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Certificate of Service

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 19th day of January 2001.



Service List for:

Case No. TO-99-593

Revised: January 17, 2001 (lb)

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