



**Linda K. Gardner**  
Senior Attorney

**Sprint Corporation**  
5454 West 110th Street  
Overland Park, KS 66211  
Voice 913 345 7915  
Fax 913 345 7568  
linda.gardner@mail.sprint.com

November 1, 1999

**FILED<sup>3</sup>**

NOV 01 1999

Missouri Public  
Service Commission

Mr. Dale Hardy Roberts  
Secretary/Chief Regulatory Law Judge  
Missouri Public Service Commission  
301 West High Street, Suite 530  
Jefferson City, MO 65101

Re: In the Matter of Proposed Rule, 4 CSR 240-2.060 Applications  
Case No. AX-2000-112

Dear Mr. Roberts:

Enclosed for filing are an original and fourteen (14) copies of Comments of Sprint Missouri, Inc. and Sprint Communications Company L.P.

If you have any questions, please do not hesitate to contact me at (913) 345-7915.

Sincerely,

*Linda K. Gardner*  
Linda K. Gardner *by David Bergmeyer*

LKG:ket  
Enclosures  
cc: All Parties

BEFORE THE PUBLIC SERVICE COMMISSION  
STATE OF MISSOURI

FILED<sup>3</sup>  
NOV 01 1999

In Re: Proposed Rule 4 CSR 240-2.060 )  
Applications. )

Case No. AX-2000-112

Missouri Public  
Service Commission

**COMMENTS OF SPRINT COMMUNICATIONS COMPANY L.P.  
AND SPRINT MISSOURI, INC.**

Proposed rule 4 CSR 240-2.060 sets out specific requirements for applications, generally, as well as certain specific applications. While the detailed list of requirements contained in proposed rule 4 CSR 240-2.060(1)(A)-(M) may very well be necessary for some applications, it is unnecessary for others. Many routine matters, such as Applications to Intervene, are filed frequently by the same companies in multiple cases. It serves no useful purpose to require Applications to Intervene to provide the detailed information that may be necessary for requests such as Applications for a Certificate of Service Authority or other, more substantive applications. For example, proposed rule 4 CSR 240.2060(1)(K) would require the Application to Intervene to include "a statement indicating whether the applicant has any pending or final judgments or decisions against it from any state or federal agency or court which involve customer service or rates." This information is not necessary in an Application to Intervene nor are several of the other required items.

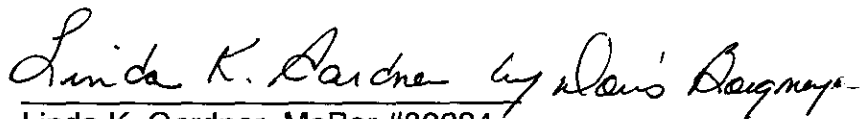
Applications to Intervene are not the only example of where the general application provisions of proposed rule 4 CSR 240-2.060(1) require more information than necessary. Under the federal Telecommunications Act of 1996, Interconnection Agreements must be filed with state Commission for approval. In many cases, the parties file pleadings styled "application" seeking the approval of the state commission

of the negotiated Interconnection Agreement under 47 U.S.C. §252(e). Again, many of the elements required under 4 CSR 240-2.060(1) are unnecessary in this type of application. For example, the partnership agreement requested in subsection (D) may well be an item necessary for the certification process but not the Commission's decision of whether the Interconnection Agreement discriminates against a carrier not a party to the agreement or is against the public interest, convenience and necessity.

Sprint urges the Commission to limit what is required generally of all applications to only those items necessary for any pleading: subsections (A), (I) and (J). The additional items should be confined to only those applications for which the information requested is relevant and necessary for the action requested.

Respectfully Submitted,

SPRINT COMMUNICATIONS COMPANY L.P.  
SPRINT MISSOURI, INC.

Handwritten signature of Linda K. Gardner in cursive script.

Linda K. Gardner MoBar #32224  
5454 W. 110th Street  
Overland Park, KS 66211  
Tele. (913) 345-7915  
Fax. (913) 345-7568  
linda.gardner@mail.sprint.com

## **CERTIFICATE OF SERVICE**

I HEREBY certify that copies of the foregoing document were served to the following by first class mail or hand-delivery on this 1<sup>st</sup> day of November, 1999:

Martha Hogerty  
Office of the Public Counsel  
P.O. Box 7800  
Jefferson City, MO 65102

Dan Joyce  
General Counsel  
Missouri Public Service Commission  
P.O. Box 360  
Jefferson City, MO 65102