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August 24, 2001

The Honorable Dale Hardy Roberts
Secretary/Chief Regulatory Law Judge
Missouri Public Service Commission
200 Madison Street, Suite 650
P. O. Box 360
Jefferson City, Missouri 65102

FILED²
AUG 24 2001
Missouri Public
Service Commission



Re: In the Matter of the Investigation of the State of Competition in the
Exchanges of Southwestern
Case No. TO-2001-467

Dear Judge Roberts:

Please accept for filing, an original and eight (8) copies of Sprint's Response to the Staff of the Missouri Public Service Commission's Second Motion to Compel in the above matter.

If you have any questions or comments, please do not hesitate to call me at 913-345-7918.

Very truly yours,

Lisa Creighton Hendricks
Lisa Creighton Hendricks *by David Bergmeyer*
Senior Attorney

/laa

Enclosures

cc: General Counsel
All Parties of Record
Office of the Public Counsel

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

FILED³
AUG 24 2001
Missouri Public
Service Commission

In the Matter of the Investigation)
of the State of Competition)
in the Exchanges of Southwestern)
Bell Telephone Company)

Case No. TO-2001-467

**SPRINT'S RESPONSE TO THE STAFF OF THE MISSOURI PUBLIC SERVICE
COMMISSION'S SECOND MOTION TO COMPEL**

COMES NOW Sprint Communications Company, L.P. and files this Response to the Staff of the Missouri Public Service Commission's Second Motion to Compel. Sprint states the following:

1. On August 7, 2001, the Staff of the Missouri Public Service Commission (Staff) filed its second motion to compel parties to respond to Data Requests from the Staff. In that motion, Staff requested the Commission to compel Sprint to be responsive to Staff Data Request No. 2506.
2. On August 14, 2001, the Commission issued its Order Granting Motions to Compel, Granting Waivers, and Denying Motion to Extend the Procedural Schedule. The Commission ordered the alternative local exchange companies listed in Staff of the Missouri Public Service Commission's Second Motion to

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Compel to answer Staff's Data Requests, which included No. 2506, no later than August 24, 2001.

3. Also on August 14, 2001, Sprint provided the Staff a clarification of its initial response. With the clarification, and subsequent discussions with Staff, Sprint believes that this information has satisfied the request of the Staff in its Data Request No. 2506.

WHEREFORE the above reasons, Sprint respectfully states for the Commission that it has fully satisfied Staff's Data Request No. 2506.

Respectfully submitted,
SPRINT

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Dan Bergman

CERTIFICATE OF SERVICE

I HEREBY certify that copies of the foregoing document were served on the following by first class mail or hand-delivery on this 24 day of August, 2001:

1-800-Reconex, Inc.
(f/k/a Sterling International Funding, Inc., d/b/a Reconex)
P.O. Box 40
2500 Industrial Avenue
Hubbard, OR 97032

2nd Century Communications, Inc.
Suite 50
7702 Woodland Center Boulevard
Tampa, FL 33614

AccuTel of Texas, Inc.
7900 John W. Carpenter Freeway
Dallas, TX 75247

Adelphia Business Solutions Operations, Inc.
121 Champion Way
Canonsburg, PA 15317

Allegiance Telecom of Missouri Public
Service Commission
1950 Stemmons Freeway, Ste. 3026
Dallas, TX 75207-3118

ALLTEL Communications, Inc.
One Allied Drive
P.O. Box 2177
Little Rock, AR 72203

American Communication Services
of Kansas City, Inc.
131 National Business Parkway, Ste 100
Annapolis Junction, MD 20701

AT&T Communications of the Southwest, Inc.
101 West McCarty, Ste. 216
Jefferson City, MO 6501

BarTel Communications, Inc.
333 Leffingwell, Suite 101
St. Louis, MO 63122

Birch Telecom of Missouri, Inc.
2020 Baltimore Avenue
Kansas City, MO 64108

Brooks Fiber Communications of Missouri, Inc.
701 Brazos, Suite 600
Austin, TX 78701

BTI (Business Telecome, Inc.)
4300 Six Forks Road, Suite 500
Raleigh, NC 27609

Buy-Tel Communications, Inc.
6409 Colleyville Boulevard
Colleyville, TX 76034

Camarato Distributing, Inc.
P.O. Box 638
Herrin, IL 62948

Central Missouri Telecommunications, Inc.
P.O. Box 596
Osage Beach, MO 65065

Ciera Network Systems, Inc.
2630 Fountainview, Suite 300
Houston, TX 77057

Computer Business Sciences, Inc.
80-02 Kew Gardens Road, Suite 5000
Kew Gardens, NY 11415

The Cube
(Tin Can Communications Company, LLC)
1063 Wirt Road, Ste 202
Houston, TX 77005

Delta Phones, Inc.
P.O. Box 784
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Delhi, LA 71232

DMJ Communications, Inc.
2525 North Grandview, Ste 900
Odessa, TX 79761

DPi-Teleconnect, LLC
2997 LBJ Freeway, Suite 225
Dallas, TX 75234

EZ Talk Communications, Inc.
4727 South Main
Stafford, TX 74777

Gabriel Communications of Missouri, Inc.
16090 Swingley Ridge Road
Chesterfield, MO 63017

Global Crossing Local Services, Inc.
(Formerly Frontier Local Services, Inc.)
1221 Nicollet Mall, Suite 300
Minneapolis, MN 55403

Global Crossing Telemanagement, Inc.
(Formerly Frontier Telemanagement, Inc.)
1221 Nicollet Mall, Suite 300
Minneapolis, MN 55403

HJN Telecom, Inc.
3235 Satellite Blvd., Bldg. 400, Ste. 300
Duluth, GA 30096

Intermedia Communications, Inc.
1 Intermedia Way
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Tampa, FL 33647-1752

Ionex Communications, Inc.
5710 LBJ Freeway, Ste. 215
Dallas, TX 75240

KMC Telecom III, Inc.
3075 Breckinridge Blvd., Ste. 415
Duluth, GA 30096

LDD, Inc.
24 South Minnesota
Cape Girardeau, MO 63702

Level 3 Communications, LLC
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Louisville, CO 80027

Logix Communications Corporation
(Formerly Dobson Wireless, Inc.)
14101 Wireless Way
Oklahoma City, OK 73134

Maxcom, Inc.
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Max-TelCommunications, Inc.
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Austin, TX 78701

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(Worldcom, Inc.)
701 Brazos, Ste. 600
Austin, TX 78701

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McLeodUSA Telecommunications
Services, Inc.
P.O. Box 31777
Cedar Rapids, IA 52406-3177

Missouri Comm South, Inc.
(Comm South Companies, Inc.)
2909 Buckner Blvd., Ste. 800
Dallas, TX 75228

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Monette, MO 65708

Mpower Communications Corp.
ATTN: Laurie Adamski
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Pittsford, NY 14534

Navigator Telecommunications, LLC
P.O. Box 13860
8525 Riverwood Park Drive
North Little Rock, AR 72113-0860

Nel-Tel Communications Corporation
(Net-Tel Corporation)
1023 31st Street, NW
Washington, DC 20007

NOW Communications, Inc.
713 Country Place Drive
Jackson, MS 39208

Omniplex Communications Group, LLC
(Formerly USA eXchange, LLC)
17 Research Park Drive
St. Charles, MO 63304

The Pager Company
3030 East Truman Road
Kansas City, MO 64127

Payroll Advance
808 South Baker
Mountain Home, AR 72643

Phones for All
(Teléfonos Parar Todos)
Preferred Carrier Services, Inc.
14681 Midway Road, Suite 105
Addison, TX 75001

Mpower Communications Central Corp.
175 Sully's Trail, Ste. 300
Pittsford, NY 14534

QCC, Inc.
(Formerly Quest Communications Corporation)
8829 Bond Street
Overland Park, KS 66214

Quick-Tel Communications, Inc.
P.O. Box 1327
Bowie, TX 76230

Quintelco, Inc.
1 Blue Hill Plaza
Pearl River, NY 10965

Qwest Communications Corporation
(USLD Communications, Inc.)
4250 N. Fairfax Drive, 12W002
Arlington, VA 22203

Ren-Tel Communications, Inc.
7337 S. Mitchell Ct.
Villa Rica, GA 30180

Simply Local Services, Inc.
2225 Apollo Dr.
Fenton, MO 63026

Smoke Signal Communications
(Choctaw Communications, LC)
8400 South Gessner
Houston, TX 77074

Snappy Phone
P.O. Box 29620
6901 West 70th Street
Shreveport, LA 71129

SouthWest TeleConnect
7000 Cameron Road, Suite 200
Austin, TX 78752-2828

Suretel, Inc.
5 North McCormick
Oklahoma City, OK 73127

TCG Kansas City, Inc.
Teleport Communications Group
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Staten Island, NY 10311

TCG St. Louis
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Staten Island, NY 10311

Tel Com Plus
(United States Telecommunications, Inc.)
5251 110th Ave., North, Suite 118
Clearwater, FL 33760-4837

Teligent, Inc.
8065 Leesburg Pike, Ste. 400
Vienna, VA 22182

Tel-Link, LLC
8601 Dunwoody Place, Ste. 406
Atlanta, GA 30350

TransStart Communications
P.O. Box 2999
Harlingen, TX 78551-2999

Universal Telephone
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Wichita, KS 67211-5455

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