## BEFORE THE PUBLIC SERVICE COMMISSION STATE OF MISSOURI

In Re: The Master Interconnection and	)	
Resale Agreement By and Between	)	
Sprint Missouri, Inc., and ICG Telecom	)	Case No. TK-2003-0535
Group, Inc. Pursuant to Sections 251 and 252	)	
of the Telecommunications Act of 1996	)	

## RESPONSE OF SPRINT MISSOURI, INC. TO PLEADINGS FILED JULY 23, 2003

Comes Now Sprint Missouri, Inc. ("Sprint") and hereby replies to the pleadings filed by the Missouri Independent Telephone Company Group ("MITCG") and the Small Telephone Company Group ("STCG") on July 23, 2003.

While both MITCG and STG appear to admit that the Revised Amendment No. 1 addresses their issue, both claim that filing the amendment at this date is inappropriate. Sprint disagrees. Sprint has filed amendments to its agreements in the past after it filed the original agreement and before Commission approval. See e.g., Case No TK-2003-0509. In that case, the original agreement was filed on April 7, 2003, the amendment was filed on May 14, 2003, and the agreement was approved on May 29, 2003. Further, interconnection agreements can be amended at any time. This is reflected in the Commission's orders approving agreements. In the Commission's standard order approving interconnection agreements, the Commission allows amendments to be made at any time. There are no limitations on amendments.

Therefore, the amendment submitted by Sprint and ICG should be considered by the Commission as it is now a part of Sprint's agreement with ICG. The

fact that ICG and Sprint determined that they would amend the agreement to address the issues raised by MITCG and STG should not be a reason to reject the agreement or restart the 90-day process.

Sprint Missouri, Inc. (Sprint)

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## **CERTIFICATE OF SERVICE**

The undersigned hereby certifies that a copy of the above and foregoing was served on each of the following parties by first-class electronic/facsimile mail, this Alpha day of July, 2003.

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