

**BEFORE THE
MISSOURI PUBLIC SERVICE COMMISSION**

In the Matter of the Application of)	
MCC Telephony of Missouri, Inc.)	Case No. TE-2006-0415
For a Waiver of Compliance with)	
The Requirement of 4 CSR 240-240-32)	

MCC TELEPHONY OF MISSOURI, INC. STATEMENT OF POSITION

Comes now MCC Telephony of Missouri, Inc. (MCC) and submits its position on the issues in this matter:

Issue: Is there good cause for the Commission to grant MCC's request for a waiver of 4 CSR 240-32.080(5)(A)?

MCC Position: Yes. MCC has demonstrated that its ordering and installation process is justifiably different from the processes used by other types of carriers. The combination of its joint offering provider relationship with Sprint and the necessity of home installation visits for all customers presents MCC with a unique set of scheduling constraints. The intervals contained in the agreement establishing MCC's joint offering provider relationship with Sprint represent current operational requirements. The requested waiver should be granted in view of this situation so that MCC may continue to provide its voice service to consumers in Missouri, thereby supporting an expanded range of consumer choice and giving Missouri consumers access to advanced technological options. Doing so is clearly in the public interest.

Issue: Should the Commission conduct a rulemaking to revise the Commission's quality of service rules?

MCC Position: Yes. The Commission should open a proceeding to review some of the current service quality rules in light of considerable changes in the competitive landscape as well as significant evolution in the technology used to deliver services. Such a proceeding should be a forum for industry members to comment on the applicability and/or the need for revision of the existing regulations.

Respectfully submitted,

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CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the above and foregoing document was sent via e-mail on this 19th day of January, 2007 to General Counsel's Office at gencounsel@psc.mo.gov; and Office of Public Counsel at opcservice@ded.mo.gov; and Craig Johnson at Craig@csjohnsonlaw.com.

/s/ Mark W. Comley