

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

In the Matter of CenturyTel of Missouri, LLC d/b/a )	
CenturyTel and Spectra Communications Group, )	<b><u>Case No. TC-2007-0307</u></b>
LLC d/b/a CenturyTel Tariff Filings to Grandfather )	Tariff Nos. JI-2007-0498
Remote Call Forward Services to Existing )	JI-2007-0499
Customers and Existing Locations )	

**STAFF’S STATEMENT OF POSITION**

COMES NOW the Staff of the Missouri Public Service Commission and states:

1. The Commission’s March 26, 2007 Order Setting Procedural Schedule directs the parties to file, no later than August 7, 2007, a List of Issues, List of Witnesses, Order of Cross-Examination, and Order of Opening Statements, and to file their respective Statements of Position by August 13, 2007.

2. The parties filed an agreed upon List of Issues on August 7, 2007.

3. The Staff states its position on those issues:

**Issue 1.** Should the Commission approve CenturyTel of Missouri, LLC’s and Spectra Communications Group, LLC d/b/a CenturyTel’s (collectively “CenturyTel”) tariff filings to grandfather Remote Call Forward (“RCF”) service to existing customers and existing locations?

**Staff’s Position:** No. RCF is useful to businesses that want to provide local numbers for customers to call without the businesses actually having a physical presence in the local area. RCF can also be useful in response to natural or man-made disasters because the service allows a customer to retain the same telephone number and have calls redirected to another location. Technological obsolescence is one reason

to grandfather a service, but RCF is not obsolete. (Voight Rebuttal, pp. 2-6)

**Issues 2.** Should the Commission require CenturyTel to fulfill Socket Internet's orders for RCF service submitted after the tariff filings, before being allowed to grandfather that service?

**Staff's Position:** Yes. These orders were submitted while CenturyTel's RCF tariff sheets were still in effect. (Voight Rebuttal, pp. 6-7)

Respectfully submitted,

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### **Certificate of Service**

I hereby certify that copies of the foregoing have been mailed, hand-delivered, transmitted by facsimile or electronically mailed to all counsel of record this 13<sup>th</sup> day of August 2007.

/s/ William K. Haas