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October 6, 2000

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Director, Utility Services

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Secretary/Chief Regulatory Law Judge

DANA K. JOYCE
General Counsel

Mr. Dale Hardy Roberts
Secretary/Chief Regulatory Law Judge
Missouri Public Service Commission
P. O. Box 360
Jefferson City, MO 65102

RE: Case No.TO-2000-261

Dear Mr. Roberts:

Enclosed for filing in the above-captioned case are an original and eight (8) conformed copies of **STAFF'S MOTION TO CANCEL PREHEARING CONFERENCE**.

This filing has been mailed or hand-delivered this date to all counsel of record.

Thank you for your attention to this matter.

Sincerely yours,

Bruce H. Bates
Assistant General Counsel
(573) 751-7434
(573) 751-9285 (Fax)

Enclosure

cc: Counsel of Record

FILED²
OCT 6 2000 *nh*
Missouri Public
Service Commission

FILED

BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI

OCT 6 2000

Missouri Public
Service Commission

In the Matter of the Application of SBC)
Advanced Solutions, Inc. for Approval of)
an Interconnection Agreement With)
Southwestern Bell Telephone Company)

Case No. TO-2000-261

STAFF'S MOTION TO CANCEL PREHEARING CONFERENCE

COMES NOW the Staff of the Missouri Public Service Commission (Staff) and states as follows:

1. On July 20, 2000, Southwestern Bell Telephone Company (SWBT) and SBC Advanced Solutions, Inc. (ASI) submitted to the Missouri Public Service Commission (Commission) a proposed Amendment No. 3 to their interconnection agreement, previously approved in this case on December 1, 1999.

2. The Commission's authority to approve or reject an interconnection agreement is set forth in Section 252 of the Federal Telecommunications Act of 1996. The Commission may only reject an agreement (or any portion thereof) adopted by negotiation if it finds that the agreement discriminates against a telecommunications carrier not a party to the agreement or the implementation of such agreement or portion is not consistent with the public interest, convenience, and necessity. 47 U.S.C § 252 (e) (2).

3. On September 7, 2000, the Staff filed its recommendation which concluded that the proposed amendment is discriminatory and that its implementation would not be consistent with the public interest, convenience, and necessity.

4. On September 19, 2000, the Commission issued its Order Establishing Prehearing Conference And Order Directing Filing Of Procedural Schedule which set a prehearing conference for November 7, 2000.

5. Also on September 19, 2000, SWBT filed its response which disagrees with the Staff's conclusion. SWBT's response was filed one day out of time. See 4 CSR 240-2.080(16), 4 CSR 240-2.050(1), and 4 CSR 240-2.010(13).

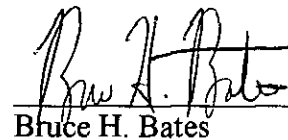
6. SWBT, ASI and the Staff have been conducting settlement negotiations and are continuing to do so.

7. However, if the Commission does not act to approve or reject a negotiated agreement within 90 days after submission, the agreement shall be deemed approved. 47 U.S.C. § 252 (e)(3). The Commission has until October 18, 2000, to approve or reject Amendment No. 3 or it shall be deemed approved.

WHEREFORE, the Staff requests the Commission to cancel the prehearing conference.

Respectfully submitted,

DANA K. JOYCE
General Counsel

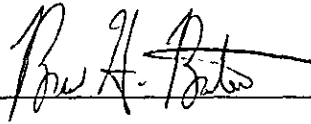


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Certificate of Service

I hereby certify that copies of the foregoing have been mailed or hand-delivered to all counsel of record as shown on the attached service list this 6th day of October 2000.



Service List for
Case No. TO-2000-261
October 6, 2000

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