

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

In the Matter of the Investigation of the)
State of Competition in the Exchanges of)
Sprint Missouri, Inc.)

Case No. IO-2003-0281

SPRINT'S STATEMENTS OF POSITIONS

COMES NOW Sprint Missouri, Inc. and hereby provides its Position Statements to
the List of Issues filed in the above referenced case.

Issue 1: Section 392.245.5 RSMo allows the Commission to classify services of
a Price Cap Company as competitive. Sprint Missouri, Inc., a Price Cap
Company, has requested that its residence core access line services
(i.e., local exchange service, local operating service, directory listing,
extension service, extended area service, local measured service and
PBX service) offered in the Kearney, Norborne, Rolla, Platte City and
St. Robert exchanges be classified as competitive. In which of these
Sprint Missouri, Inc. exchanges, if any, should Sprint's residence core
access line services be classified as competitive?

Sprint Position: Sprint's testimony demonstrates that effective
competition exists in Kearney, Norborne, Rolla, Platte City, and St.
Robert. Sprint should receive competitive classification for its
residence core access line services in all five exchanges.

Issue 2: Section 392.245.5 RSMo allows the Commission to classify services of
a Price Cap Company as competitive. Sprint Missouri, Inc., a Price Cap
Company, has requested that its residence access line-related services
(i.e. Sprint Solutions, busy line verification service, customer calling
services, express touch, network service packages) offered in the
Kearney, Norborne, Rolla, Platte City and St. Robert exchanges be
classified as competitive. In which of these Sprint Missouri, Inc.
exchanges, if any, should Sprint's residence access line-related services
be classified as competitive?

Sprint Position: Sprint's testimony demonstrates that effective
competition exists in Kearney, Norborne, Rolla, Platte City, and St.

Robert. Sprint should receive competitive classification for its residence access line-related services in all five exchanges.

Issue 3: Section 392.245.5 RSMo allows the Commission to classify services of a Price Cap Company as competitive. Sprint Missouri, Inc., a Price Cap Company, has requested that its business core access line services (i.e., local exchange service, local operating service, directory listing, extension service, extended area service, local measured service and PBX service) offered in the Kearney, Norborne, Rolla, Platte City and St. Robert exchanges be classified as competitive. In which of these Sprint Missouri, Inc. exchanges, if any, should Sprint's business core access line services be classified as competitive?

Sprint Position: Sprint's testimony demonstrates that effective competition exists in Kearney, Norborne, Rolla, Platte City, and St. Robert. Sprint should receive competitive classification for its business core access line services in all five exchanges.

Issue 4: Section 392.245.5 RSMo allows the Commission to classify services of a Price Cap Company as competitive. Sprint Missouri, Inc., a Price Cap Company, has requested that its business access line-related services (i.e. Sprint Solutions, busy line verification service, customer calling services, express touch, network service packages) offered in the Kearney, Norborne, Rolla, Platte City and St. Robert exchanges be classified as competitive. In which of these Sprint Missouri, Inc. exchanges, if any, should Sprint's business access line-related services be classified as competitive?

Sprint Position: Sprint's testimony demonstrates that effective competition exists in Kearney, Norborne, Rolla, Platte City, and St. Robert. Sprint should receive competitive classification for its business access line-related services in all five exchanges.

Issue 5: Section 392.245.5 RSMo allows the Commission to classify services of a Price Cap Company as competitive. Sprint Missouri, Inc., a Price Cap Company, has requested that its high capacity exchange access line services be classified as competitive. In which Sprint Missouri, Inc. exchanges, if any, should Sprint's high capacity exchange access line services be classified as competitive?

Sprint Position: Sprint withdrew its request to have its high capacity exchange access services designated competitive. Sprint's position is that they should not be designated competitive at this time.

Issue 6:

Section 392.245.5 RSMo allows the Commission to classify services of a Price Cap Company as competitive. Sprint Missouri, Inc., a Price Cap Company, has requested that its CENTREX services be classified as competitive. In which Sprint Missouri, Inc. exchanges, if any, should Sprint's CENTREX services be classified as competitive?

Sprint Position: Sprint's testimony demonstrates that effective competition exists on a statewide basis for its CENTREX services and therefore Sprint should receive competitive classification for all its exchanges.

Issue 7:

Section 392.245.5 RSMo allows the Commission to classify services of a Price Cap Company as competitive. Sprint Missouri, Inc., a Price Cap Company, has requested that its intraLATA private line services be classified as competitive. In which Sprint Missouri, Inc. exchanges, if any, should Sprint's intraLATA private line services be classified as competitive?

Sprint Position: Sprint's testimony demonstrates that effective competition exists on a statewide basis for its IntraLATA private line services and therefore Sprint should receive competitive classification for all its exchanges.

Issue 8:

Section 392.245.5 RSMo allows the Commission to classify services of a Price Cap Company as competitive. Sprint Missouri, Inc., a Price Cap Company, has requested that its ATM and Frame Relay services be classified as competitive. In which Sprint Missouri, Inc. exchanges, if any, should Sprint's ATM and Frame Relay services be classified as competitive?

Sprint Position: Sprint's testimony demonstrates that effective competition exists on a statewide basis for its ATM and Frame Relay services and therefore Sprint should receive competitive classification for all its exchanges.

Issue 9:

Section 392.245.5 RSMo allows the Commission to classify services of Price Cap Company as competitive. Sprint Missouri, Inc., a Price Cap Company, has requested that its special access services be classified as competitive. In which Sprint Missouri, Inc. exchanges, if

any, should Sprint's special access services be classified as competitive?

Sprint Position: Sprint withdrew its request to have its special access services designated competitive. Sprint's position is that they should not be designated competitive at this time

Issue 10:

Section 392.245.5 RSMo allows the Commission to classify services of a Price Cap Company as competitive. Sprint Missouri, Inc., a Price Cap Company, has requested that its intraLATA MTS services be classified as competitive. In which Sprint Missouri, Inc. exchanges, if any, should Sprint's intraLATA MTS services be classified as competitive?

Sprint Position: Sprint's testimony demonstrates that effective competition exists on a statewide basis for its IntraLATA MTS service and therefore Sprint should receive competitive classification for all its exchanges.

Issue 11:

Section 392.245.5 RSMo allows the Commission to classify services of a Price Cap Company as competitive. Sprint Missouri, Inc., a Price Cap Company, has requested that its intraLATA WATS services and 800 services be classified as competitive. In which Sprint Missouri, Inc. exchanges, if any, should Sprint's intraLATA WATS services and 800 services be classified as competitive?

Sprint Position: Sprint's testimony demonstrates that effective competition exists on a statewide basis for its IntraLATA WATS and 800 services and therefore Sprint should receive competitive classification for all its exchanges.

Issue 12:

Section 392.245.5 RSMo allows the Commission to classify services of a Price Cap Company as competitive. Sprint Missouri, Inc., a Price Cap Company, has requested that its Common Channel Signaling/Signaling System 7 (LIDB) services be classified as competitive. In which Sprint Missouri, Inc. exchanges, if any, should Sprint's Common Channel Signaling/Signaling System 7 (LIDB) services be classified as competitive?

Sprint Position: Sprint's testimony demonstrates that effective competition exists on a statewide basis for its Line Information Data Base Access (LIBD) services and therefore Sprint should receive competitive classification for all its exchanges.

Issue 13:

Section 392.245.5 RSMo allows the Commission to classify services of a Price Cap Company as competitive. Sprint Missouri, Inc., a Price Cap Company, has requested that its Speed Dial services be classified as competitive. In which Sprint Missouri, Inc. exchanges, if any, should Sprint's Speed Dial services be classified as competitive?

Sprint Position: Sprint's testimony demonstrates that effective competition exists on a statewide basis for its Speed Dial services and therefore Sprint should receive competitive classification for all its exchanges.

Issue 14:

Section 392.245.5 RSMo allows the Commission to classify services of a Price Cap Company as competitive. Sprint Missouri, Inc., a Price Cap Company, has requested that its Payphone services offered in the Kearney, Norborne, Rolla, Platte City and St. Robert exchanges be classified as competitive. In which of these Sprint Missouri, Inc. exchanges, if any, should Sprint's Payphone services be classified as competitive?

Sprint Position: Sprint's testimony demonstrates that effective competition exists in Kearney, Norborne, Rolla, Platte City, and St. Robert. Sprint should receive competitive classification for its Payphone services in all five exchanges.

Issue 15:

Section 392.245.5 RSMo allows the Commission to classify services of a Price Cap Company as competitive. Sprint Missouri, Inc., a Price Cap Company, has requested that its Directory Assistance services be classified as competitive. In which Sprint Missouri, Inc. exchanges, if any, should Sprint's Directory Assistance services be classified as competitive?

Sprint Position: Sprint's testimony demonstrates that effective competition exists on a statewide basis for its Directory Assistance services and therefore Sprint should receive competitive classification for all its exchanges.

Issue 16:

Section 392.245.5 RSMo allows the Commission to classify services of a Price Cap Company as competitive. Sprint Missouri, Inc., a Price Cap Company, has requested that its Local Operator services be classified as competitive. In which Sprint Missouri, Inc. exchanges, if any, should Sprint's Local Operator services be classified as competitive?

Sprint Position: Sprint's testimony demonstrates that effective competition exists on a statewide basis for its Local Operator services and therefore Sprint should receive competitive classification for all its exchanges.

Issue 17:

Section 392.245.5 RSMo allows the Commission to classify services of a Price Cap Company as competitive. Sprint Missouri, Inc., a Price Cap Company, has requested that its ISDN services offered in the Kearney, Norborne, Rolla, Platte City and St. Robert exchanges be classified as competitive. In which of these Sprint Missouri, Inc. exchanges, if any, should Sprint's ISDN services be classified as competitive?

Sprint Position: Sprint withdrew its request for competitive classification for ISDN in its Norborne exchange. Sprint's testimony demonstrates that effective competition exists in Kearney, Rolla, Platte City, and St. Robert and Sprint should receive competitive classification for its ISDN services in these four exchanges.

Issue 18:

Section 392.245.5 RSMo allows the Commission to classify services of a Price Cap Company as competitive. Sprint Missouri, Inc., a Price Cap Company, has requested that its Optional MCA services offered in the Kearney exchange be classified as competitive. Should Sprint's Optional MCA services be classified as competitive in that Sprint Missouri, Inc. exchange?

Sprint Position: Yes. Sprint is only seeking competitive classification for its optional MCA service for those exchanges where the Commission has deemed the overall exchange to be competitive. To clarify, Sprint seeks competitive classification for the exchanges of (1) Kearney, (2) Platte City, (3) Rolla, (4) St. Robert, and (5) Norborne exchanges; however, Sprint only offers its optional MCA service in Kearney and Platte City exchanges. Thus, Sprint only seeks competitive classification for optional MCA service in the Kearney and Platte City exchange. Sprint is not seeking competitive classification for optional MCA service in any other exchange. Sprint's testimony demonstrates that effective competition exists in the Kearney and Platte City exchanges.

Issue 19:

In absence of a request by Sprint Missouri, Inc. for the reclassification of a service in an exchange pursuant to Section 392.245.5, RSMo from price cap regulation to competitive status, should the Commission make

a finding that effective competition does not exist and order that the current price cap regulation continue to apply?

Sprint Position: No. An order from the Commission that the existing price cap regulations continue to apply for Sprint's remaining services and exchanges is not needed. The Price Cap Statute continues to apply except in those exchanges where an alternative provider has provided service for at least five years. Sprint does not have any exchanges in which an alternative provider has provided service for five years. Therefore, Sprint services remain subject to price cap statute.

Issue 20:

Section 392.245.5, RSMo provides that the Commission shall investigate the state of competition in Sprint's exchanges within five years of an alternative local exchange telecommunications company first being certified. ExOP of Missouri Inc.'s certification was effective on December 15, 1998. If the Commission does not issue a decision in this case by December 15, 2003, will any of Sprint Missouri Inc.'s telecommunications services in any Sprint Missouri, Inc. exchange be automatically reclassified or reclassified by default from price cap regulation to a competitive status?

Sprint Position: No, Sprint's service will not be reclassified until ExOP has actually provided basic local services in a given exchange for at least five years. Reclassification only occurs in the exchange in which the alternative provider has provided services for at least five years. Further, Sprint will need to make a filing notifying the Commission of compliance with Section 392.245.5 and any party opposing reclassification can seek intervention.

Respectfully submitted,
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 9th day of July, 2003.

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