

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

In the Matter of a Request for the Modification )	
Of the Kansas City Metropolitan Calling Area Plan )	Case No. TO-2005-0144
To Make the Greenwood Exchange Part of the )	
Mandatory MCA Tier 2 )	

**OFFICE OF PUBLIC COUNSEL’S OBJECTIONS TO SOUTHWESTERN BELL  
TELEPHONE, L.P.’S DATA REQUESTS TO OFFICE OF PUBLIC COUNSEL**

The Office of the Public Counsel objects to the following data requests propounded by Southwestern Bell Telephone, LP. because they are vague, overbroad, burdensome, and oppressive in that they request “any and all” evidence and “any and all” documents without limitations as to time and without limitations as to the scope of the local calling scope petition and this particular case. *State ex rel. Kawasaki Motors Corp. v. Ryan*, 777 S.W.2d 247 (Mo App E.D. 1989).

1-12 Please provide any and all evidence and analysis that residential customers in the Greenwood exchange that do not currently subscribe to MCA service would be willing to pay the Tier 2 price for basic local telecommunications service plus an amount not to exceed \$2.00 and any and all evidence and analysis concerning the willingness of residential customers to pay a higher amount.

1-13 Please provide any and all evidence and analysis that business customers in the Greenwood exchange that do not currently subscribe to MCA service would be willing to pay the Tier 2 price for basic local telecommunications service plus an amount not to exceed \$3.00 and any and all evidence and analysis concerning the willingness of business customers to pay a higher amount.

1-14 Please produce any and all documents, including but not limited to surveys, which OPC has in its possession related to what residential customers in the Greenwood exchange are willing to pay for basic local telecommunications service (including any differentiation based on the calling scope related thereto) and expanded local calling service.

1-15 Please produce any and all documents, including but not limited to surveys, which OPC has in its possession related to what business customers in the Greenwood exchange are willing to pay for basic local telecommunications service (including any differentiation based on the calling scope related thereto) and expanded local calling service.

1-16 Please produce any and all evidence collected and analysis conducted by the OPC concerning the various services that are available to residential customers in the Greenwood exchange for calling to the Kansas City exchange.

1-17 Please produce any and all evidence collected and analysis conducted by the OPC concerning the various services that are available to business customers in the Greenwood exchange for calling to the Kansas City exchange.

1-20 Please attach any and all documents, including but not limited to any scripts, which OPC has in its possession regarding information that it provides to residential and/or business customers or that it references in responding to such customers when they call requesting toll free calling into adjoining exchanges or into a nearby metropolitan area.

1-25 Please attach any and all documents, including but not limited to any scripts, which OPC has in its possession regarding information that it provides to residential and/or business customers or that it references in responding to such customers about competitive alternatives that are available to them for basic local telecommunications service.

1-26 Please provide a copy of all documents concerning toll free calling into the Greenwood exchange.

For the foregoing reasons, Public Counsel objects to these enumerated data requests.

Respectfully submitted,

OFFICE OF THE PUBLIC COUNSEL

**/s/ Michael F. Dandino**

BY: \_\_\_\_\_  
Michael F. Dandino (24590)  
Deputy Public Counsel  
P.O. Box 2230  
Jefferson City, MO 65102  
(573) 751-4857  
(573) 751-5559  
Fax (573) 751-5562  
email: [mike.dandino@ded.mo.gov](mailto:mike.dandino@ded.mo.gov)

**CERTIFICATE OF SERVICE**

I hereby certify that a copy of these Objections were served on the following parties via e-mail on November 28, 2005.

MIMI B. MACDONALD  
Attorneys for Southwestern Bell Telephone, L.P.  
One SBC Center, Room 3510  
St. Louis, Missouri 63101  
[mimi.macdonald@sbc.com](mailto:mimi.macdonald@sbc.com) (E-Mail)

David Meyer  
General Counsel's Office  
Mo. Public Service Commission  
PO Box 360  
Jefferson City MO 65102

**/s/ Michael F. Dandino**

---