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January 20, 2004

Missouri Public Service Commission  
Attn: Secretary of the Commission  
200 Madison Street, Suite 100  
P.O. Box 360  
Jefferson City, Missouri 65102-0360

**FILED**

JAN 20 2004

Re: Case No. TO-2004-0207  
Mass Market Impairment Inquiry

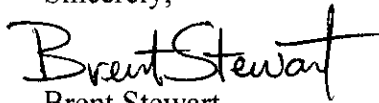
Missouri Public  
Service Commission

Dear Mr. Roberts:

Please find enclosed for filing in the above-referenced case an original and eight (8) copies of the Phase I Position Statement of Sage Telecom, Inc.

A copy of this filing has been sent this date via email to counsel for all parties of record.

Sincerely,

  
Brent Stewart

CBS/bt

Enclosure

cc: Counsel for all parties of record  
Katherine Mudge

FILED

JAN 20 2004

BEFORE THE PUBLIC SERVICE COMMISSION  
OF THE STATE OF MISSOURI

Missouri Public  
Service Commission

In the Matter of a Commission Inquiry into       )  
the Possibility of Impairment without       )  
Unbundled Local Circuit Switching When       )  
Serving the Mass Market       )       Case No. TO-2004-0207

**SAGE TELECOM, INC.'S STATEMENT OF POSITION  
ON ISSUES IN PHASE I**

COMES NOW Sage Telecom, Inc. ("Sage"), by and through Counsel, and states its position on each issue of the issues to be heard at the evidentiary hearing in this case in Phase I that is scheduled to begin on January 27, 2003.

**Sage's Position on the Issues**

1. For purposes of examining whether there is "non-impairment" in the provision of unbundled local switching to serve mass-market customers, what are the relevant geographic markets within the State of Missouri? The relevant geographic market for the impairment analysis is the incumbent local exchange company's ("ILEC") wire center. In addition, there may be limitations on use of the entire wire center where a competitive local exchange company ("CLEC") cannot provide service to customers due to inability to access certain ILEC facilities (*i.e.*, IDLC loops), or the traditional ILEC retail price discrimination that exists between residential and business customers.

2. For purposes of the 47 CFR 51.3.19(d)(2)(iii)(B)(3) analysis, how many DS0 lines must be supplied to a multi-line DS0 customer before that customer is considered to be an enterprise customer rather than a mass market customer? Sage submits that any customer served by a DS0/voice equivalent loop should be considered a

mass market customer, regardless of whether the customer has multiple DS0 lines. In the event that the Commission decides to establish a cross-over delineation, and the Commission finds that AT&T has sufficiently supported its calculations, then, the Commission should use a range of 3 – 13 lines for use in the impairment analysis for each ILEC wire center based on the appropriate data. To the extent that the Commission is not satisfied with AT&T's supporting documentation, Sprint's proposal of 10 lines could be used to establish the upper boundary of the range. Furthermore, to the extent that a cross-over point is actually established, the Commission should grandfather Sage's existing customers from being impacted by the cross-over or implementation of non-impairment standards.

Respectfully submitted,

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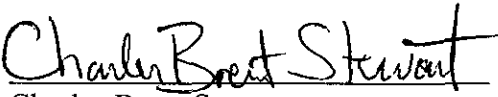
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By:   
Charles Brent Stewart

ATTORNEYS FOR SAGE TELECOM,  
INC.

**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing document was served on counsel for all parties of record this 20<sup>th</sup> day of January, 2004 via electronic mail.

  
Charles Brent Stewart