

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

In The Matter of a Request for Expansion of	)	
the St. Louis Metropolitan Calling Area Plan to	)	
include the exchanges of Washington, Union,	)	Case No. TO-2005-0141
Wright City, St. Clair, Marthasville, Beaufort,	)	
Foley and Warrenton.	)	

**OFFICE OF THE PUBLIC COUNSEL'S REQUEST FOR PUBLIC HEARINGS**

The Office of the Public Counsel requests the Missouri Public Service Commission schedule and hold public hearings on this request to expand the present St. Louis Metropolitan Calling Area Plan to include the exchanges of Washington, Union, Wright City, St. Clair, Marthasville, Beaufort, Foley and Warrenton as an optional Tier 6.

These exchanges have a community of interest with each other and the St Louis metropolitan area now served by the MCA. As a result, there should be toll free calling or low cost calling plans to permit two way calling between those exchanges without toll. For this reason, Public Counsel asks the Commission to hold public hearings to receive comments from customers and community and municipal officials on the community of interest, the public desire for such calling scope, the relationship between expanded calling as proposed and the legislative goals and purposes in Section 392.185, RSMo, 2000, and the other public interest implications of expanded calling for these exchanges.

Public Counsel suggests that that two public hearings be held: one in Washington and one in Innsbrook (Wright City) so that the public hearings will be convenient for customers and there will be a hearing in each area served by SBC and CenturyTel, the incumbent local exchange companies. Public Counsel suggests public hearings for

November 30, December 1, 2, 5, 6, 7, 8, or 9, 2005 as scheduling and available locations permit.

There have been significant consumer requests for toll free calling into adjoining exchanges or into nearby metropolitan areas from the residents of these exchanges. This public demand for expanded local calling to avoid toll charges for calls made within the communities of interest is reflected in the petitions filed from the Wright City and Innsbrook communities and in letters from the other exchanges protesting the end of SBC's Local Plus flat rated calling plan. The petitions were filed in *In The Matter Of A Further Investigation of the Metropolitan Calling Area Service After Passage and Implementation of the Telecommunications Act of 1996*, Case No TO-2001-391 and the letters were identified and quoted in *In The Matter Of An Investigation Into the Adequacy of the Local Calling Scopes of SBC local exchanges of Washington, Union, and St.Clair, and Beaufort in and around Franklin County*, Case No. TO-2003-0298.

Because the original petitions and letters requesting expanded calling did not reference specific terms and conditions for the proposed MCA expansion, Public Counsel suggested an expansion plan as a starting point for consideration. Public hearings would provide a forum for residents to comment on the need for expanded calling and define the communities of interest of these exchanges and provide an opportunity for the public to comment on the terms and conditions of the plan, including price, and make other comments which would assist the Commission in its deliberations and assist Public Counsel evaluate its proposal in light of these public comments.

In general, the proposal is to add a new Tier 6 to the MCA plan to include the exchanges of Washington, Union, Wright City, St. Clair, Marthasville, Beaufort, Foley

and Warrenton. At the present time, Public Counsel has not performed any study or taken any final position regarding a proposed price, but for purposes of discussion, Public Counsel suggested that Tier 6 be priced the same as Tier 5, that is, \$32.50 residential (local not included) and \$70.70 business (local not included). Subscription to the Tier 6 MCA would be optional and would be an additional charge above and beyond the charge for local service and any other existing EAS charges. Tier 6 would be on a bill and keep intercompany compensation system since that is the same as the existing MCA plan.

WHEREFORE, Public Counsel asks the Commission to schedule and hold public hearings at locations that are reasonably convenient for attendance by the customers in these exchanges.

**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 the foregoing was electronically transmitted, mailed or hand-delivered to all counsel of record on this 9<sup>th</sup> day of November.

**/s/ Michael F. Dandino**

\_\_\_\_\_