

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

In the Matter of the Request of Southwestern Bell)
Telephone, L.P., d/b/a SBC Missouri, for) Case No. TO-2006-0102
Competitive Classification Pursuant to Section) Tariff File No. YL-2006-0145
392.245.6, RSMo (2005) – 60 day Petition.)

STAFF’S SUPPLEMENTAL INFORMATION

COMES NOW the Staff of the Missouri Public Service Commission and states:

1. On October 7, 2005, the Commission issued its Order Directing Filings which, *inter alia*, directs the Staff to file supplemental information.
2. In the attached Response, the Staff describes its review of annual reports and follow-up contacts. The Staff also reports on business and residential line counts in the requested exchanges. If line counts are not sufficient, the Staff requests five additional working days to try to obtain information as to whether a regulated provider of local voice services has 2 or more business or residential customers, as appropriate, in an exchange.

Respectfully submitted,

DANA K. JOYCE
General Counsel

/s/ William K. Haas

William K. Haas
Deputy General Counsel
Missouri Bar No. 28701

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Certificate of Service

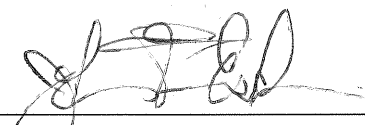
I hereby certify that copies of the foregoing have been mailed, hand-delivered, transmitted by facsimile or electronically mailed to all counsel of record this 11th day of October 2005.

/s/ William K. Haas

VERIFICATION OF MEMORANDUM

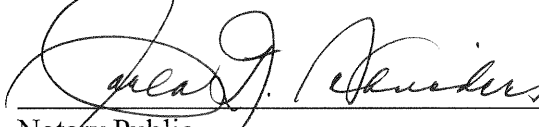
State of Missouri)
) ss
County of Cole)

John Van Eschen, of lawful age on his oath states: that he is manager of the Missouri Public Service Commission's Telecommunications Department; that he participated in the preparation of the attached Response that he has knowledge of the matters set forth therein and that such matters are true to the best of his knowledge and belief.



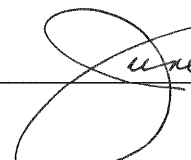
John Van Eschen

Subscribed and sworn to before me this 11th day of October, 2005.

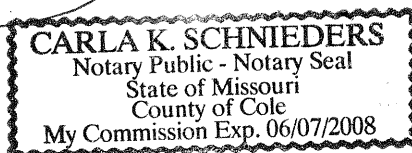


Notary Public

My commission expires



June 7, 2008



Order Directing Filings
Case No. TO-2006-0102

On October 7, 2005 the Commission issued an Order Directing Filings. The Commission directed various parties to respond by October 11, 2005. This Commission Staff response attempts to respond to the following aspects of this directive:

Section 392.245.5(6) describes that “...the commission shall consider their own records concerning ownership of facilities and shall make all inquiries as are necessary and appropriate from regulated providers of local voice service to determine the extent and presence of regulated local voice providers in an exchange.” What actions did Staff take to comply with this provision for each exchange in which SBC Missouri requests competitive classification of its business or residential services?

Pages 6 through 14 of John Van Eschen’s Amended Direct Testimony describe Staff’s initial actions. In general, Staff relied on the 2004 Annual Reports filed by competitive local exchange carriers. These annual reports provide line quantities on an exchange-specific basis. These lines are also categorized based on resale, UNE-P, UNE-L and facility based provisioning. Follow-up contacts were made with competitive local exchange carriers to ensure the reports were tabulated correctly and to obtain more recent data. The Staff also relied upon the wireless information submitted by the company as well as wireless data obtained from the Federal Communications Commission’s Ninth Report released September 28, 2004 in WT Docket No. 04-111, FCC 04-216, *in the Matter of Implementation of Section 6002(b) of the Omnibus Budget Reconciliation Act of 1993 and an Annual Report and Analysis of Competitive Market Conditions with Respect to Commercial Mobile Services*. Based on follow-up questions by the Commission in other dockets concerning competitive classification requests, Staff also reviewed Local Exchange Routing Guide data as to whether the wireless carriers identified by SBC in its application were assigned telephone numbers within the exchange’s local calling scope.

Attached are two summaries which are designated as highly confidential. One summary pertains to residential services while the second summary pertains to business services for the exchanges SBC has requested competitive status in the 60-day proceeding. These summaries show access line quantities for competitive local exchange carriers as well as whether the wireless provider identified by SBC as serving the exchange has been assigned telephone numbers within the exchange’s local calling scope. The access line quantities for specific competitive local exchange carriers are identified if the carrier is providing local voice service on a UNE-P, UNE-L or a full facility basis. These summaries are designated as highly confidential because some of the companies have classified their respective access line quantities as highly confidential.

For each regulated provider of local voice service that SBC Missouri identifies as a competitor for business services in an exchange, does such provider have 2 or more business customers whose addresses are located within that exchange?

If the Commission desires to count UNE-P providers as qualifying for competitive status, then the previously described summaries may be responsive to the Commission's question. These summaries show all competitors in a particular exchange if the competitor is providing service on a UNE-P, UNE-L or full facility basis. In other words the summaries do not simply show the competitors identified by SBC. These summaries show that all of the exchanges that SBC has requested competitive status have multiple competitors. A reasonable assumption is that multiple competitors within a specific exchange are serving different customers. Staff realizes such information does not address the Commission's question, but it is the only information Staff has available at this time. In order to directly answer the Commission's question the Staff will need to contact each wireline company identified in the previously described summaries. Such a request will take at least 5 business days to comply with the Commission's October 7, 2005 Order Directing Filings, assuming carriers will readily have such information. Additional time may also be necessary if the Commission desires a sworn affidavit or other formalized response from these carriers. Since the hearing is scheduled for October 12-13, and potentially October 17, 2005, Staff requests further direction from the Commission.

For each regulated provider of local voice service that SBC Missouri identifies as a competitor for residential services in an exchange, does such provider have 2 or more residential customers whose addresses are located within that exchange?

If the Commission desires to count UNE-P providers as qualifying for competitive status, then the previously described summaries may be responsive to the Commission's question. These summaries show all competitors in a particular exchange if the competitor is providing service on a UNE-P, UNE-L or full facility basis. In other words the summaries do not simply show the competitors identified by SBC. These summaries show that nearly all of the exchanges that SBC has requested competitive status have multiple competitors. The lone exception is the Gravois Mills exchange which appears to only have one wireline provider. A reasonable assumption is that multiple competitors within a specific exchange are serving different customers. Staff realizes such information does not address the Commission's question, but it is the only information Staff has available at this time. In order to directly answer the Commission's question the Staff will need to contact each wireline company identified in the previously described summaries. Such a request will take at least 5 business days to comply with the Commission's October 7, 2005 Order Directing Filings, assuming carriers will readily have such information. Additional time may also be necessary if the Commission desires a sworn affidavit or other formalized response from these carriers. Since the hearing is scheduled for October 12-13, and potentially October 17, 2005, Staff requests further direction from the Commission.