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April 8, 2003

Mr. Dale Hardy Roberts Secretary/Chief Regulatory Law Judge Missouri Public Service Commission P.O. Box 360 Jefferson City, MO 65102

RE: Case No. TT-2003-0390

Tariff File No. JX-2003-1743

Southwestern Bell Communications Services, Inc. d/b/a SBC Long Distance

Dear Mr. Roberts:

Enclosed for filing on behalf of SBC Long Distance, please find an original and eight (8) copies of Response of Southwestern Bell Communications Services, Inc. d/b/a SBC Long Distance in Opposition to Staff's Motion to Suspend and Reject Tariff Filing.

Thank you for bringing this filing to the attention of the appropriate Commission personnel.

Sincerely,

Larry W. Dority

Enclosure

cc: Office of the Public Counsel

General Counsel

David A. Meyer, Associate General Counsel

BEFORE THE PUBLIC SERVICE COMMISSION OF THE STATE OF MISSOURI

In the Matter of Southwestern Bell)	
Communications Services, Inc. d/b/a SBC)	Case No. TT-2003-0390 Tariff File No. JX-2003-1743
Long Distance's Tariff Filing to Initiate)	
Promotions Applicable to its Value Plus)	
Residential Plans.)	

RESPONSE OF SOUTHWESTERN BELL COMMUNICATIONS SERVICES, INC. D/B/A SBC LONG DISTANCE IN OPPOSITION TO STAFF'S MOTION TO SUSPEND AND REJECT TARIFF FILING

Comes now Southwestern Bell Communications Services, Inc. d/b/a SBC Long Distance ("SBCLD"), pursuant to the Commission's Order Shortening Time In Which To Respond, and for its response in opposition to Staff's Motion to Suspend and Reject Tariff Filing ("Staff's Motion") filed with respect to the tariff filing noted above, states as follows:

1. On March 28, 2003, SBCLD, a competitive interexchange telecommunications company offering a competitive service, long distance telecommunications, filed revisions to its PSC Mo.-No. 1 Tariff to introduce promotions applicable to its four "Value Plus" optional calling plans designed for residential customers. The promotional filings were designated Tariff File No. JX-2003-1743, and the tariff sheets have an effective date of April 12, 2003. The "Value Plus" tariff filings were filed on March 14, 2003, designated Tariff File No. JX-2003-0390, and have an effective date of April 13, 2003.

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¹ Prior to seeing the Commission's Order this date in a listing of "Orders Issued by Delegation," on April 4, 2003, SBCLD filed correspondence with the Commission advising the parties and the Commission that, due to the effective dates of the proposed tariffs, it would be filing its responsive pleading in opposition to Staff's Motion no later than April 9, 2003, prior to the expiration of the 10-day period allowed by Commission Rule.

- 2. On April 4, 2003, Staff filed its <u>Motion to Suspend and Reject Tariff Filing</u> with respect to both of SBCLD's competitive filings, noting that the "Staff previously has sent a routing slip to the Commission in which it stated that it had no objections to SBCLD's filing. However, upon additional review and consideration, Staff has concluded that the filing should be suspended and rejected." The "Value Plus" Tariff File No. JX-2003-1688 has been designated Case No. TT-2003-0391. The promotional Tariff File No. JX-2003-1743 has been designated Case No. TT-2003-0390.
- 3. SBCLD, concurrently herewith, has filed its Response in Opposition to Staff's Motion to Suspend and Reject Tariff Filing in Case No. TT-2003-0391, and SBCLD hereby adopts and incorporates by reference that pleading herein.

WHEREFORE, for all the foregoing reasons, SBCLD respectfully requests the Commission to deny Staff's Motion and to approve the promotional tariffs as filed.

Respectfully submitted,

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Attorneys for Southwestern Bell Communications Services, Inc. d/b/a SBC Long Distance

² Staff Motion, Footnote 2, at 2.

CERTIFICATE OF SERVICE

I do hereby certify that a true and correct copy of the foregoing pleading has been hand-delivered, e-mailed, or mailed by First Class, U.S. Mail, postage prepaid, this 8th day of April, 2003, to:

Dana K. Joyce General Counsel Missouri Public Service Commission P.O. Box 360 Jefferson City, MO 65102

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