

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

In The Matter of a Request for Expansion)
of the Kansas City Metropolitan Calling) Case No. TO-2005-0142
Area Plan to Include the Exchange of)
Lexington As Part of Tier 5.)

**SPRINT RESPONSE TO
OFFICE OF THE PUBLIC COUNSEL'S REQUEST FOR
EXPANSION OF THE KANSAS CITY CALLING AREA PLAN**

COMES NOW Sprint Missouri, Inc. ("Sprint") and for its response to a request for expansion of the Kansas City Metropolitan Calling Area Plan filed by the Office of the Public Counsel ("OPC") on November 22, 2004 states as follows:

1. On November 22, 2004, the OPC filed a request asking the Missouri Public Service Commission ("Commission") to expand the present Kansas City Metropolitan Calling Area Plan to include the Lexington exchange as part of Tier 5 on an optional basis. In its request, OPC suggests that there have been significant consumer requests and demand for toll free calling into adjoining exchanges or into nearby metropolitan areas from the residents of the Lexington exchange.

2. Sprint has not witnessed any evidence to support OPC's allegation that there has been significant customer requests nor has Sprint received any customer complaints regarding this issue. Moreover, Sprint has not observed any demonstrable consumer interest in expanding the Kansas City calling area plan to include the Lexington exchange.

3. OPC further suggests that MCA expansion would advance the economic development and economy of the Kansas City metropolitan community. Once again,

Sprint has not seen any demonstrable evidence to support this claim. Sprint would note that any MCA expansion could potentially have a detrimental economic impact on interexchange carriers and local exchange carriers operating in the Kansas City metropolitan area.

4. In its request, OPC relies upon the proposed recommendation of the MCA/Expanded Calling Scopes Task Force in TW-2004-0471 that the "Public Service Commission should promulgate a rule and implement a process to entertain requests for the establishment of new expanded calling plans, or changes to existing expanded calling plans." Sprint supports the findings of the Task Force. Sprint also supports and encourages further investigation into this issue; however, there is not currently a rule in place nor has the industry or any interested party had any opportunity to provide input into the proposed rule. As such, Sprint recommends that if the Commission wishes to proceed in this matter, before a formal rule is in effect, that the Commission follow its standard procedures.

5. OPC requests the Commission to issue notices to interested parties and convene an initial conference to discuss its request for the MCA modification. Sprint is not opposed to this initial step as suggested by the OPC, however Sprint notes that interested parties must include all potentially impacted ILECs, CLECs and interexchange carriers. While Lexington is a Sprint Missouri exchange, all local exchange carriers operating in the Kansas City MCA as well as all interexchange carriers providing intraLATA service in the Kansas City LATA will likely be impacted by the Commission's actions in this matter. As part of an initial conference, the participating

parties can negotiate an appropriate procedural schedule for the Commission's consideration of the OPC's request.

WHEREFORE, Sprint respectfully requests that before proceeding with an investigation the Commission direct OPC to file a pleading outlining the significant customer requests it claims have been made for the MCA expansion as well as any other evidence that such expansion would advance the economic development and economy of the Kansas City metropolitan community. Once these claims have been adequately demonstrated, Sprint would support OPC's request that the Commission issue notices to all interested parties as discussed above, and an initial conference to discuss the proposed MCA modification.

Respectfully submitted,

SPRINT MISSOURI, INC.

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that on this 2nd day of December, 2004, a copy of the above and foregoing document was served via electronic mail, facsimile or U.S.

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