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April 12, 2004

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

Re: Case No. TX-2003-0379

Dear Mr. Roberts:

In response to **Proposed Rule 4 CSR 240-3.545 Filing Requirements for Telecommunications Company Tariffs**, as published in the March 1, 2004 edition of the Missouri Register, CenturyTel¹ respectfully concurs in the written Comments filed this date by the Missouri Telecommunications Industry Association ("MTIA"). CenturyTel also offers the following additional comments for the Commission's consideration.

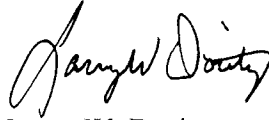
Regarding Section (12), CenturyTel submits that only "required" customer notices should accompany tariff filings. CenturyTel also agrees with the comments of MTIA concerning the level of detail of the "summary information" in cover letters required by the proposed rule as being too burdensome (and, in many cases, impossible to comport with the 100-word limitation). For new tariff filings, a cover letter may be useful to identify what type of filing is attached along with general information; however, given the increased bundling of services in the telecommunications industry, customer impact may well depend on the specific services purchased. Revisions to tariff sheets have margin identifiers that highlight exactly what is being revised or added/deleted to existing text. CenturyTel would respectfully note that the recent direction in Commission filings since implementation of the Commission's Electronic Filing and Information System ("EFIS"), has been away from utilizing cover letters whenever possible (*e.g.*, 4 CSR 240-2.080(9), "Each pleading may be accompanied by a cover letter which states the subject matter. This cover letter shall contain no matter for commission decision.") (emphasis added).

¹ These comments are provided on behalf of CenturyTel of Missouri, LLC and Spectra Communications Group, LLC d/b/a CenturyTel, collectively referred to herein as "CenturyTel."

CenturyTel also supports the MTIA's suggestions that Section 19, Promotions, should focus on the service offered (and attendant classification), and not the classification of the underlying carrier. This would comport with the statutory sections addressing promotional programs (*e.g.*, Section 392.200.2, . . . "Promotional programs for telecommunications services may be offered by telecommunications companies for periods of time so long as the offer is otherwise consistent with the provisions of this chapter and approved by the commission. . . ." (emphasis added). *See* also, Sections 392.361; 392.245.5.

If you have any questions regarding this filing, please contact the undersigned. Thank you for your assistance in this matter.

Sincerely,

A handwritten signature in black ink, appearing to read "Larry W. Dority". The signature is fluid and cursive, with the first name "Larry" being more prominent.

Larry W. Dority

cc: Mr. Arthur Martinez, CenturyTel