

**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. TE-2006-0053
A Waiver of Certain Requirements of 4 CSR)	
29.040(4).)	

**SUGGESTIONS IN SUPPORT OF AT&T MISSOURI'S
PROPOSED PROCEDURAL SCHEDULE**

AT&T Missouri¹ respectfully submits these suggestions in support of its request that the Missouri Public Service Commission ("Commission") adopt the procedural schedule being proposed by AT&T Missouri.

1. The Proposed Schedule. Pursuant to the Commission's January 31, 2006 Order,² AT&T Missouri has submitted a proposed procedural schedule concluding in single hearing on May 17, 2006, that would potentially allow the resolution of all issues in the case by the end of May:

List of Issues	March 10, 2006
AT&T Missouri's Direct Testimony	March 31, 2006
Staff and Intervenor's Rebuttal Testimony	April 28, 2006
Witness List and Order of Proceeding	May 5, 2006
Surrebuttal Testimony - all parties	May 12, 2006
Position Statements	May 12, 2006
Hearing	May 17 and 18, 2006 (if needed)

In crafting this proposed schedule, AT&T Missouri worked with counsel for Staff, MITG, STCG, CenturyTel and Sprint to ensure that their needs (e.g., the time for preparing Rebuttal) were met and that the proposed May 17-18 hearing date did not present any conflicts. On the other hand,

¹ Southwestern Bell Telephone, L.P., d/b/a AT&T Missouri will be referred to in this pleading as "AT&T Missouri." It previously conducted business as "SBC Missouri."

² Order Denying Motion to Dismiss, Extending Temporary Waiver and Scheduling Prehearing Conference, Case No. TE-2006-0053, issued January 31, 2006 at p. 3.

counsel for AT&T Missouri did not learn of the procedural dates being proposed by Staff, MITG and STCG until late in the day of filing (i.e., today) and has not been able to determine whether AT&T Missouri's witnesses can meet Staff, MITG and STCG's proposed procedural schedule.

2. A single hearing will bring this case to resolution in a more expeditious fashion. This case has been pending since July 14, 2005, when AT&T Missouri filed its Application for Waiver/Variance. The Commission originally set this case for hearing on September 14, 2005. At the parties' request, the Commission, through a series of orders, extended a temporary waiver previously granted so that the waiver now expires on March 31, 2006.³ Although AT&T Missouri's proposed schedule exceeds the current March 31, 2006 waiver date, the additional time requested is necessary for the preparation of prefiled testimony to address the complex and technical issues being presented in this case. But under AT&T Missouri's proposed schedule all issues would be presented to the Commission by the proposed May 17-18 hearing, with a possible total resolution by the end of May.

Staff, MITG and STCG's proposed schedule, however, could potentially delay the full resolution of this case until August or later. Under their proposed schedule, only the first issue (Does Rule 240-29.040(4) require CPN for wireless-originated calls to be included in the intercompany billing record?) would be presented to the Commission during the proposed April 17-18 hearing. And if that threshold question is determined in the affirmative, another full procedural schedule would be required for the waiver/variance issue, necessitating another round of prefiled Direct, Rebuttal, Surrebuttal testimony and a second hearing. As a proposed procedural schedule for this second phase would not be filed until mid-May, it is unlikely that this second phase of the case will be presented to the Commission, heard and a final decision resolving the case rendered before August, if not later.

³ Order Denying Motion to Dismiss, supra, at p. 3.

3. Two separate hearings would be burdensome for AT&T Missouri and other parties' with out-of-town witnesses. In order to bring the necessary expertise and technical knowledge necessary for the Commission's determination in this case, AT&T Missouri will be bringing at least two witnesses from outside the State of Missouri. These witnesses will be traveling from Dallas, Texas to attend the hearing, arriving the day before and staying through the duration of the hearing. Splitting this case into two hearings would require them to make duplicate trips to Missouri, doubling not only their travel time and expenses but also doubling their hearing preparations and the hearing itself. Given the interrelatedness of the issues and evidence that will be presented, it would be most efficient to require witnesses to appear only once for this proceeding, and for the Commission to hear it only once.

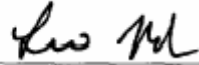
4. The two issues overlap and should be taken together. AT&T Missouri concurs that there will be only two issues presented in this proceeding (e.g., Does the rule require CPN to be included in the intercarrier billing record? If so, should the Commission grant AT&T Missouri's request for waiver/variance?). But there is considerable overlap between the issues and in evidence that will be required for the Commission to fully understand and decide them. For example, resolution of both issues will necessarily involve a detailed inquiry into existing industry standards, the basis for the standards, how the standards have been implemented by manufacturers and applied by carriers, the current practice in Missouri, and the significant financial and practical impact of requiring CPN to be included in intercompany wireless billing records. Commissioner resources would be most effectively used by the presentation of this information in a single proceeding.

WHEREFORE, AT&T Missouri respectfully requests the Commission to adopt the procedural schedule AT&T Missouri proposes.

Respectfully submitted,

SOUTHWESTERN BELL TELEPHONE, L.P.

BY

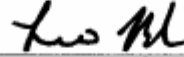


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CERTIFICATE OF SERVICE

Copies of this document were served on the following parties by e-mail on February 23, 2006.



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