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

In the Matter of a New Proposed Rule 4 ) Case N CSR 240-33.045 )

Case No. TX-2005-0258

## SPRINT COMMENTS

COMES NOW Sprint Missouri, Inc. and Sprint Communications Company, L.P. (herein collectively referred to as 'Sprint') and hereby offers its comments in the above referenced case, commonly referred to at the Line Item Billing rule.

Sprint generally favors the approach taken by the Commission in its proposed rule. Specifically, Sprint supports the Commission's intent for carriers to provide meaningful disclosures of all charges. Sprint also supports the Commission's intent for carriers to clearly label charges on customers' bills without disguise or misleading information. The Commission's proposed rule fully addresses (a) upfront disclosure and (b) clear and meaningful billing practices.

Sprint is concerned, however, about the potential for multiple interpretations of certain language in section (4) - specifically the last sentence which reads: "The presence of a charge in a currently effective tariff is not evidence, in and of itself, that the charge is authorized or mandated by the Commission". Sprint understands that this sentence is intended to prohibit carriers from labeling a company-imposed fee as a government-endorsed or mandated fee simply because the Commission approved a tariff. However, this sentence could also be interpreted to go much farther. Specifically, the second sentence of section (4) could be interpreted to invalidate all carrier tariffs which were previously approved by the Commission.

Sprint recommends the elimination of section (4) in its entirety. Sprint submits that the paragraph is not needed to address the Commission's concerns of (a) upfront disclosure and (b) clear and meaningful billing practices. The first sentence of section (4) simply states that the Commission Staff has the ability to seek information. Staff clearly has that ability today without the rule, either in an informal phase or through the issuance of a data request.

WHEREFORE Sprint respectfully requests the Commission consider its Comments in this matter.

Respectfully submitted,

SPRINT

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## **CERTIFICATE OF SERVICE**

The undersigned hereby certifies that on this 14<sup>th</sup> day of April, 2005, Sprint's Comments were served via U.S. Mail, to each of the following:

Mark Poston Missouri Public Service Commission 200 Madison Jefferson City, Missouri 65102

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