

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

In the Matter of a request for the)	
Modification of the Kansas City)	
Metropolitan Calling Area Plan to make)	Case No. TO-2005-0144
the Greenwood Exchange Part of the)	
Mandatory MCA Tier 2.)	

SUGGESTIONS IN SUPPORT OF THE STIPULATION AND AGREEMENT

COMES NOW the Staff of the Missouri Public Service Commission (Staff) and for its Suggestions in Support of the Stipulation and Agreement states as follows:

1. On November 22, 2004, the Office of Public Counsel filed a request to modify the Kansas City Calling Area Plan to Include the Greenwood Exchange in the Mandatory Metropolitan Calling Area ("MCA") Tier 2.

2. On December 15, 2005, the Office of the Public Counsel ("OPC"), Southwestern Bell Telephone, L.P., d/b/a AT&T Missouri ("AT&T Missouri"), and the Staff of the Missouri Public Service Commission filed a *Stipulation and Agreement* ("*Stipulation*") in order to resolve this case.

3. Staff believes that the agreed to *Stipulation* is reasonable for the customers in the Greenwood exchange and the Kansas City MCA Plan, even though the terms and conditions of the *Stipulation* are slightly different than requested by OPC in its Final Recommendation filed April 29, 2005 and in OPC Direct Testimony filed November 18, 2005. Specifically, the terms and conditions of the *Stipulation* outline the following benefits to the customers in the Greenwood exchange and to MCA subscribers in the Kansas City MCA:

(a) The Greenwood exchange will become a mandatory MCA exchange. The optional MCA charge for Greenwood exchange customers will be eliminated. The existing Extended

Area Service (“EAS”) charges for non-MCA customers in the Greenwood exchange will be eliminated. The existing EAS charges allow customers to call the Belton and Lee’s Summit zones of the Kansas City metropolitan exchange for an additional \$ 0.10 per month for residential access lines and \$ 0.29 per month for business access lines.

(b) The *Stipulation* maintains the current calling scope for Greenwood exchange MCA customers. Under the OPC’s Final Recommendation filed April 29, 2005, the effect of classifying MCA customers in the Greenwood exchange as Tier 2 MCA customers would slightly reduce the Greenwood MCA customer local calling scope. The *Stipulation* allows the Greenwood exchange MCA customer local calling scope to remain as currently exists.

(c) The *Stipulation* outlines that all customers in the Greenwood exchange will be considered MCA customers. Staff believes that this condition would alleviate current problems and potential problems in the future as MCA service would be mandatory and included within the local rate and the EAS charge. This means that the current non-MCA customers in the Greenwood exchange (customer local calling area) would be able to call the schools within the Lee’s Summit R-7 school district and Lee’s Summit government offices located in the city of Lee’s Summit as a local call. Additionally, the Lee’s Summit R-7 School District and Lee’s Summit government offices may call existing non-MCA customers (under Stipulation, become MCA customers) as a local call and not a toll call.

(d) The existing calling scope of non-MCA customers in the Greenwood exchange would be expanded, and would (under the *Stipulation*) then include calling the Kansas City Mandatory Tiers (Principal, Tier 1 and Tier 2); Tier 3 customers; and Tier 4 and Tier 5 subscribers. This equates to approximately an additional 500,000 telephone numbers (wireline only) that may be

called as a local call for an additional \$6.11 (\$6.21 - \$0.10) for residential customers and an additional \$10.71 (\$11.00 - \$0.29) for business customers.

(e) Existing MCA customers in the Greenwood exchange would see a reduction in their existing bill.

<u>Existing</u>	<u>Residential</u>	<u>Business</u>	<u>Multi-line</u>
Rate Group B	\$ 8.79	\$ 22.30	\$ 37.80
MCA Additive	<u>\$12.35</u>	<u>\$ 24.80</u>	<u>\$ 24.80</u>
Total	\$21.14	\$ 47.10	\$ 62.60

Stipulation and Agreement

Rate Group B	\$ 8.79	\$ 22.30	\$ 37.80
EAS Additive	<u>\$ 6.21</u>	<u>\$ 11.00</u>	<u>\$ 11.00</u>
Total	\$ 15.00	\$ 33.30	\$ 48.80
<i>Savings</i>	<u>\$ 6.14</u>	<u>\$ 13.80</u>	<u>\$ 13.80</u>

For rate comparison purposes, current rates for the Lee's Summit exchange are:

<u>Existing</u>	<u>Residential</u>	<u>Business</u>	<u>Multi-line</u>
Lee's Summit Exchange	\$ 12.07	\$ 38.50	\$ 45.00

(f) All Greenwood exchange customers will be permitted to retain their current telephone number(s) regardless of whether they currently subscribe to MCA service. No customer will be inconvenienced by having to change their telephone number.

(g) All terms and conditions regarding MCA service as set forth in the MCA Orders remain in place.

(h) AT&T Missouri waives any right it may have to revenue neutrality so long as the Commission approves the *Stipulation* without modification.

(i) Other parties to this case, Cass County Telephone Company, Lathrop Telephone Company, CenturyTel of Missouri, L.L.C., Spectra Communications Group, L.L.C., d/b/a CenturyTel, and MoKan Dial, Inc. do not oppose this *Stipulation*.

4. All Parties to this case, each of who had interests distinct and different from the others agreed upon, or do not oppose, the terms of the *Stipulation*. Staff believes that the agreement between the parties is itself evidence of reasonableness.

5. Staff believes that the reasons stated above provide ample support that the *Stipulation* filed is reasonable, and the Commission should therefore approve the *Stipulation*.

WHEREFORE, for the foregoing reasons, the Staff requests the Commission to approve the *Stipulation*.

Respectfully submitted,

DANA K. JOYCE
General Counsel

/s/ David A. Meyer

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Certificate of Service

I hereby certify that copies of the foregoing have been mailed, hand-delivered, transmitted by facsimile or electronically mailed to all counsel of record this 29th day of December, 2005.

/s/ David Meyer

VERIFICATION

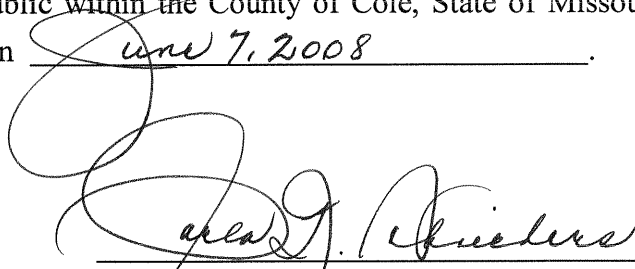
STATE OF MISSOURI)
)
COUNTY OF COLE)

Comes now William L. Voight, employee of the Staff of the Missouri Public Service Commission, being of lawful age and after being duly sworn, states that he has read the accompanying pleading, and that the facts therein are true and correct.



William L. Voight
Affiant

Subscribed and affirmed before me this 28th day of December, 2005. I am commissioned as a notary public within the County of Cole, State of Missouri, and my commission expires on June 7, 2008.



NOTARY PUBLIC

