

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

In the Matter of a Commission Inquiry into)	
the Possibility of Impairment without)	Case No. TO-2004-0207
Unbundled Local Circuit Switching When)	
Serving the Mass Market)	

**SBC MISSOURI’S SUPPLEMENT TO ITS MOTION
TO COMPEL RESPONSES TO ITS DATA REQUESTS**

Southwestern Bell Telephone, L.P. d/b/a SBC Missouri (“SBC Missouri”), in accordance with the Commission’s January 16, 2004, Order Rescheduling Argument and Setting Filing Deadline (“Order”), hereby supplements its January 12, 2004, Motion to Compel by filing “all objections, responses and partial responses to the data requests to which it seeks to compel responses.” Order, p. 1. These materials, attached hereto, are separated into three groups in the following order: (1) general objections of MCImetro Access Transmission Services, LLC, MCI WorldCom Communications, Inc., Brooks Fiber Communications of Missouri, Inc., and Intermedia Communications, Inc. (collectively, “MCI”) and XO Missouri, Inc. (“XO”); (2) responses of MCI; and (3) responses of XO. Inasmuch as the second and third groups of attachments contain or refer to Highly Confidential information, they have been provided to the Honorable Lewis Mills under separate cover.

Respectfully submitted,

SOUTHWESTERN BELL TELEPHONE, L.P.

BY 

PAUL G. LANE #27011

LEO J. BUB #34326

ROBERT J. GRYZMALA #32454

MIMI B. MACDONALD #37606

Attorneys for Southwestern Bell Telephone, L.P.

One SBC Center, Room 3516

St. Louis, Missouri 63101

314-235-6060 (Telephone)

314-247-0014 (Facsimile)

robert.gryzmala@sbc.com

CERTIFICATE OF SERVICE

Copies of this document were served on all counsel of record by e-mail on January 20, 2004.


Robert J. Gryzmala

NATHAN WILLIAMS
MISSOURI PUBLIC SERVICE COMMISSION
PO BOX 360
JEFFERSON CITY, MO 65102

MICHAEL DANDINO
OFFICE OF THE PUBLIC COUNSEL
PO BOX 7800
JEFFERSON CITY, MO 65102

LISA CREIGHTON HENDRICKS
SPRINT MISSOURI, INC.
6450 SPRINT PARKWAY, BLDG. 14
MAIL STOP KSOPHN0212-2A253
OVERLAND PARK, KANSAS 66251

REBECCA B. DECOOK
AT&T COMMUNICATIONS OF THE
SOUTHWESTS, INC.
1875 LAWRENCE STREET, SUITE 1575
DENVER, CO 80202

CARL J. LUMLEY
LELAND B. CURTIS
CURTIS OETTING HEINZ GARRETT & SOULE,
P.C.
130 S. BEMISTON, SUITE 200
ST. LOUIS, MO 63105

STEPHEN F. MORRIS
MCI TELECOMMUNICATIONS CORP.
701 BRAZOS, SUITE 600
AUSTIN, TX 78701

WILLIAM J. COBB, III
COVAD COMMUNICATIONS COMPANY
1100 CONGRESS AVENUE, SUITE 1100
AUSTIN, TEXAS 78701

SHELDON K. STOCK
JASON L. ROSS
GREENSFELDER, HEMKER & GALE, PC
10 SOUTH BROADWAY, SUITE 2000

ST. LOUIS, MO 63102

JAMES M. FISCHER
LARRY DORITY
FISCHER & DORITY, PC
101 MADISON, SUITE 400
JEFFERSON CITY, MO 65101

CHARLES BRENT STEWART
STEWART & KEEVIL, LLC
4603 JOHN GARRY DRIVE, SUITE 11
COLUMBIA, MO 65203

KATHERINE K. MUDGE
SMITH, MAJCHER & MUDGE, L.L.P.
816 CONGRESS AVENUE, SUITE 1270
AUSTIN, TEXAS 78701

WILLIAM J. COBB, III
COVAD COMMUNICATIONS COMPANY
1100 CONGRESS AVENUE, SUITE 1100
AUSTIN, TEXAS 78701

CAROL KEITH
NUVOX COMMUNICATIONS
16090 SWINGLEY RIDGE ROAD, SUITE 500
CHESTERFIELD, MO 63017

WILLIAM D. STEINMEIER
MARY ANN (GARR) YOUNG
WILLIAM D. STEINMEIER, P.C.
P.O. BOX 104595
JEFFERSON CITY, MO 65110

DAVID WOODSMALL
XSPEDIUS COMMUNICATIONS
555 WINGHAVEN BLVD, SUITE 300
O'FALLON, MO 63366

CHARLES GERKIN
ALLEGIANCE TELECOM, INC.
1919 M STREET, NW
SUITE 420
WASHINGTON, DC 20036

MARK W. COMLEY
NEWMAN, COMLEY & RUTH P.C.
601 MONROE STREET, SUITE 301
PO BOX 537
JEFFERSON CITY, MO 65102

PATRICK R. COWLISHAW
KATHLEEN LAVALLE
JACKSON WALKER L.L.P.
901 MAIN STREET, SUITE 6000
DALLAS, TX 75202

BILL MAGNES
VALERIE KIRK
CASEY & GENTZ, L.L.P.
919 CONGRESS AVENUE, SUITE 1060
AUSTIN, TEXAS 78701

ROSE M. MULVANY
BIRCH TELECOM OF MISSOURI, INC.
2020 BALTIMORE AVE.
KANSAS CITY, MO 64108

WILLIAM H. COURTER
MCLEODUSA TELECOMMUNICATIONS
SERVICES, INC.
6400 C STREET SW
PO BOX 3177
CEDAR RAPIDS, IA 52406-3177

ROGELIO PENA
PEÑA & ASSOCIATES, LLC
1375 WALNUT ST., SUITE 200
BOULDER, CO 80302