

CURTIS, OETTING, HEINZ, GARRETT & O'KEEFE, P.C.
Attorneys at Law
130 South Bemiston, Suite 200
St. Louis, Missouri 63105
(314) 725-8788
Fax (314) 725-8789

Carl J. Lumley
Principal

clumley@cohgs.com

March 25, 2004

Secretary of the Commission
Missouri Public Service Commission
P.O. Box 360
Jefferson City, MO 65102-0360

Re: Case No. TX-2001-0512

Dear Secretary of the Commission:

Thank you for the opportunity to submit comments regarding proposed rules 4 CSR 240-33.060.

The blocking requirements of subsections 3-6 appear to be too broadly stated. Typically the blocking capabilities are resident in the local service switch or the customers' PBX equipment. Hence, it is not possible for all telecommunications carriers to provide the blocking that would be required under the proposed rule. For example, a carrier providing long distance service by T-1 connection through a customer's PBX would have to rely upon the customer's equipment to provide any desired blocking.

We request that the language of these subsections be revised to make it clear that these are required features of basic local service, and not any and all services offered by any and all providers.

Very truly yours,

/s/ Carl J. Lumley

Carl J. Lumley

CJL:dn

cc. Office of Public Counsel
General Counsel