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September 29, 1999

FILED³

SEP 30 1999

Missouri Public
Service Commission

The Honorable Dale Hardy Roberts
Secretary/Chief Regulatory Law Judge
Missouri Public Service Commission
301 West High Street, Floor 5A
Jefferson City, Missouri 65101

Re: Case No. OX-2000-12

Dear Judge Roberts:

Enclosed for filing with the Missouri Public Service Commission in the above-referenced case is an original and 14 copies of Comments of Southwestern Bell Telephone Company.

Please stamp "Filed" on the extra copy and return the copy to me in the enclosed self-addressed, stamped envelope.

Thank you for bringing this matter to the attention of the Commission.

Very truly yours,

A handwritten signature in cursive script that reads "Anthony K. Conroy".

Anthony K. Conroy

Enclosure

cc: Attorneys of Record

BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI

FILED³

SEP 30 1999

In the Matter of 4 CSR 240-2.020 Proposed)
Amendment, Meetings and Hearings.)

Case No. OX-2000-12

Missouri Public
Service Commission

COMMENTS OF SOUTHWESTERN BELL TELEPHONE COMPANY

COMES NOW Southwestern Bell Telephone Company (SWBT) and submits its
Comments to the Missouri Public Service Commission (Commission) regarding the
Commission's proposed amendments to Rule 2.020.

SWBT does not oppose any of the proposed amendments to Rule 2.020. In particular,
SWBT concurs with the Commission's proposal to amend Rule 2.020 by deleting current
subsection (4) of the rule, which provides:

Three (3) commissioners constitute a quorum for the transaction of business, the
performance of any duty or the exercise of any power of the commission.

SWBT agrees that the Commission may eliminate this provision, inasmuch as §386.130 RSMo
(1994) already establishes the requirements for a "quorum" for effective Commission action.

Section 386.130 provides, in pertinent part, as follows:

A majority of the commissioners shall constitute a quorum for the transaction of
any business, for the performance of any duty or for the exercise of any power of
the commission, and may hold meetings of the commission at any time or place
within the state.

Because "quorum" is already defined by statute, it is redundant and unnecessary for a similar
definition to be included in Rule 2.020.

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Respectfully submitted,

SOUTHWESTERN BELL TELEPHONE COMPANY

BY Anthony Conway

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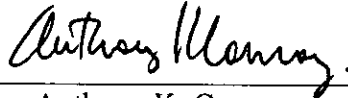
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CERTIFICATE OF SERVICE

Copies of this document were served on the following parties by first-class, postage prepaid, U.S. Mail on September 29, 1999.



Anthony K. Conroy

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