

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

In the Matter of the Application of SBC)
Long Distance, LLC, for a Name Change)

Case No. XN-2006-0268

STAFF RESPONSE TO ORDER DIRECTING FILING

COMES NOW the Staff of the Missouri Public Service Commission and for its response states:

1. On January 10, 2006, the Commission issued an Order Directing Filing ordering the Staff and SBC Long Distance, LLC, to file a response, no later than January 11, 2006, at 4:00 p.m., addressing four issues. The Order provides that the Staff and SBC Long Distance, LLC, may agree between themselves which party will address each issue.
2. In the attached statement, the Staff addresses issues (b) and (d).

Respectfully submitted,

/s/ William K. Haas

William K. Haas
Deputy General Counsel
Missouri Bar No. 28701

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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 11th day of January 2006.

/s/ William K. Haas

In the Matter of the Application of SBC)
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)

STATE OF MISSOURI)
)ss
COUNTY OF COLE

1. I am presently Rates and Tariff Supervisor in the Telecommunications Department of the Missouri Public Service Commission.
2. In accordance with the Commission's directive, the Staff and SBC Long Distance have agreed that the Company will address issues (a), (c) and (d) and the Staff will address issues (b) and (d) of the Commission's January 10th Order.
3. In response to **item (b) – Identification of tariffs currently in place:**

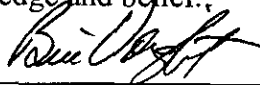
AT&T Communications of the Southwest, Inc. P.S.C. Mo. No. 10
AT&T Communications of the Southwest, Inc. P.S.C. Mo. No. 15
AT&T Communications of the Southwest, Inc. P.S.C. Mo. No. 22
AT&T Communications of the Southwest, Inc. P.S.C. Mo. No. 23
AT&T Communications of the Southwest, Inc. P.S.C. Mo. No. 24

4. In response to item (d) - Potential for customer confusion caused by use of the name AT&T:

I attest to an opinion that reflects concern over potential customer confusion by the contemplated name change from SBC Long Distance to AT&T Long Distance. Based on my experience, AT&T Communications of the Southwest, Inc. is typically referred to in the state of Missouri as "AT&T". Changing SBC Long Distance to AT&T Long Distance is, in my opinion, a potential area of customer confusion.

5. I attest that, to the best of my knowledge and belief, SBC Long Distance provides service only to the local exchange customers of the former SBC Missouri. Stated differently, SBC Long Distance does not provide long distance telecommunications service to end users who are not also end users of the former SBC Missouri.
6. I attest that, to the best of my knowledge and belief, AT&T Communications of the Southwest, Inc. has traditionally provided long distance telecommunications service to any willing residential or business customer in Missouri, regardless of local exchange carrier affiliation, and regardless of geographic location.
7. Items 5 and 6 above reflect a certain overlapping in the service areas of SBC Long Distance and AT&T Communications of the Southwest, Inc. It is my opinion that the potential for customer confusion is greatest in instances where the geographic service areas of SBC Long Distance and AT&T Communications of the Southwest, Inc. are one and the same. This geographic area is comprised of franchise area of the incumbent local exchange carrier, SBC Missouri.
8. I attest to an opinion that the potential for customer confusion is tempered by SBC Long Distance's statements that there will be no change in the rates, terms, or conditions of customer service.
9. I have examined SBC Long Distance's *Customer Notice Message* and find it acceptable.
10. Instances whereby the Commission has previously recognized telecommunications companies using similar names in Missouri include: Spectra Communications Group, LLC d/b/a CenturyTel, CenturyTel of Missouri, LLC; CenturyTel of Northwest Arkansas, LLC, CenturyTel Long Distance, Inc., CenturyTel Fiber Company II, LLC, CenturyTel Solutions, LLC; Fidelity Communications Services I, Inc., Fidelity Communications Services, II, Inc., Fidelity Communications Services, III, Inc.; KMC Telecom III, LLC and KMC Telecom V, Inc.; Network One, Network Long Distance, Inc., Network Plus, Inc., Network Utilization Services, Network IP, LLC, Network Operator Services, Inc.; Long Distance America, Long Distance Billing Services, Inc., Long Distance Direct Holdings.
11. I have participated in the preparation of this Affidavit to be presented in the above entitled case and the information in this Affidavit was given by me and,

12. I have knowledge of the matters set forth in this Affidavit, and that such matters are true and correct to the best of my knowledge and belief.



William Voight

Subscribed and sworn to before me this 11th day of Apr. 2006.

