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September 19, 2005

The Honorable Colleen M. Dale
Secretary/Chief Regulatory Law Judge
Missouri Public Service Commission
200 Madison Street, Suite 100
Jefferson City, Missouri 65101

Re: Case No. TO-2006-0102

Dear Judge Dale:

Attached for filing with the Missouri Public Service Commission in the above-referenced case is the Highly Confidential ("HC") version and the redacted ("NP") version of Southwestern Bell Telephone, L.P., d/b/a SBC Missouri's Direct Testimony of Craig A. Unruh.

SBC Missouri classified Schedules 2(HC) and 3(HC) from Mr. Unruh's Testimony because they contain private business information that cannot be found in any format in any public document and their public disclosure would harm SBC Missouri and other companies' respective business interests. These exhibits identify the specific CLECs using SBC Missouri's facilities either under a commercial agreement or through UNE-P to provide business or residential services (or both) in each of the requested exchanges. As such, the information qualifies for Highly Confidential treatment as it constitutes "information relating directly to specific customers," here SBC Missouri wholesale customers.¹

In addition, these Schedules qualify for Highly Confidential treatment on the basis that they contain "market-specific information relating to services offered in competition with others."² On the wholesale side, there are now carriers providing wholesale services (such as switching or other facilities) to other carriers for use in the provision of retail services. Schedules 2(HC) and 3(HC)'s identification of SBC Missouri's specific wholesale customers in each exchange for residence and/or business services would be valuable to other wholesale service providers in the marketing of their wholesale services. On the retail side, Schedules 2(HC) and 3(HC) may give other retail telecommunications carriers insight into the exchanges being targeted by SBC Missouri's wholesale customers that would assist these other carriers in the marketing of their own retail services.

¹ See, Protective Order, issued September 2, 2005, at p. 1.

² Id.

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Exhibits B-1 (Revised) and B-2 (Revised) to Mr. Unruh's Testimony, which are nearly identical to Exhibits B-1(HC) and B-2(HC) from the Petition, are not classified as Highly Confidential because of the Commission's September 13, 2005, declassification Order.

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

Very truly yours,

A handwritten signature in blue ink, appearing to read "Lw M", positioned above the printed name "Leo J. Bub".

Leo J. Bub

Attachments

cc: Attorneys of Record

Exhibit No.:
Issue: Policy
Witness: Craig A. Unruh
Type of Exhibit: Direct Testimony
Sponsoring Party: Southwestern Bell Telephone, L.P.
d/b/a/ SBC Missouri
Case No.: TO-2006-0102
Date Testimony Prepared: September 19, 2005

SOUTHWESTERN BELL TELEPHONE, L.P. d/b/a
SBC MISSOURI

CASE NO. TO-2006-0102

DIRECT TESTIMONY

OF

CRAIG A. UNRUH

St. Louis, Missouri

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CASE NO. TO-2006-0102
SOUTHWESTERN BELL TELEPHONE, L.P.
D/B/A/ SBC MISSOURI
DIRECT TESTIMONY OF CRAIG A. UNRUH

INTRODUCTION

Q. PLEASE STATE YOUR NAME AND BUSINESS ADDRESS.

A. My name is Craig A. Unruh and my business address is One SBC Center, Room
3528, St. Louis, Missouri, 63101.

Q. BY WHOM ARE YOU EMPLOYED AND IN WHAT POSITION?

A. I am employed by Southwestern Bell Telephone, L.P. d/b/a SBC Missouri (SBC
Missouri) and serve as its Executive Director – Regulatory. I am responsible for
advocating regulatory policy and managing SBC Missouri's regulatory
organization.

**Q. HAVE YOU PREPARED AN EXHIBIT THAT SUMMARIZES YOUR
PROFESSIONAL AND EDUCATIONAL BACKGROUND AND
EXPERIENCE BEFORE THE MISSOURI PUBLIC SERVICE
COMMISSION (COMMISSION)?**

A. Yes. This information is contained in Unruh - Schedule 1.

PURPOSE AND MAIN POINTS OF TESTIMONY

Q. WHAT IS THE PURPOSE OF YOUR TESTIMONY?

1 A. My testimony explains that SB 237 has significantly changed the manner in which
2 competitive classifications are granted. With a 60 day request, the legislature has
3 made clear that competitive classification requests are to be granted unless there is
4 a compelling reason to find that granting the request is not in the public interest.
5 My testimony also presents the evidence that was provided in SBC Missouri's
6 Petition demonstrating the significant number of competitors in each of the
7 exchanges requested by SBC Missouri under the 60 day process. Also, since
8 Staff has already submitted its recommendations and testimony for this case, my
9 testimony will also respond to some general points raised in Mr. Van Eschen's
10 testimony.

11
12 **Q. WHAT ARE THE MAIN POINTS THE COMMISSION SHOULD**
13 **UNDERSTAND ABOUT YOUR TESTIMONY?**

14 A. The Commission should understand the following points about my testimony and
15 this case in general:

- 16 • SB 237 significantly changed the manner in which the Commission grants
17 competitive classifications.
- 18 • The Commission no longer determines whether "effective competition" exists and
19 is not to review the "extent" of competition or make pricing and service
20 comparisons.
- 21 • The focus of the statute is now on "choice." The law recognizes that as long as
22 there is choice for consumers, the competitive marketplace should be permitted to
23 work.

- 1 • The law requires that the Commission grant the requested competitive
2 classifications within 60 days unless the Commission finds that a competitive
3 classification is contrary to the public interest.

4
5 **Q. WHAT IS THE PURPOSE OF THIS CASE?**

6 A. SBC Missouri seeks a competitive classification, under the provisions of Section
7 392.245.5 RSMo, for each of the 49 residential exchanges and for each of the 26
8 business exchanges that it specifically identified in its Petition for the 60 day
9 process to the extent these exchanges are not classified as competitive in Case No.
10 TO-2006-0093 (SBC Missouri's 30 day case). In addition, SBC Missouri seeks
11 competitive classification in this case for each of the exchanges for which SBC
12 Missouri requested competitive classification in Case No. TO-2005-0093 to the
13 extent competitive classification was not granted in that case.

14

15 **STATUTORY CRITERIA FOR OBTAINING A COMPETITIVE**
16 **CLASSIFICATION UNDER THE 60 DAY PROCESS**

17 **Q. WHAT ARE THE CRITERIA SPELLED OUT IN 392.245.5 FOR**
18 **OBTAINING A COMPETITIVE CLASSIFICATION UNDER THE 60 DAY**
19 **PROCESS?**

20 A. The 60-day track requires the Commission to examine all types of competition
21 that exists within the exchange and is not limited to the type of competition
22 specified for the 30 day process. Section 392.245.5 permits a price cap regulated
23 ILEC to seek competitive classification based on competition from other entities

1 providing “local voice service.” In addition to competition from entities providing
2 local service using their own facilities in whole or in part, the 60 day track also
3 requires consideration of competitors that use the ILEC’s facilities or a third
4 party’s facilities. The statute requires the Commission to grant competitive
5 classification within 60 days unless it determines that such classification is
6 contrary to the public interest:

7 Notwithstanding any other provision of the subsection, any
8 incumbent local exchange company may petition the commission
9 for competitive classification within an exchange based on
10 competition from any entity providing local voice service in whole
11 or in part by using its own telecommunications facilities or other
12 facilities or the telecommunications facilities or other facilities of a
13 third party, including those of the incumbent local exchange
14 company as well as providers that rely on an unaffiliated third
15 party Internet service. The commission shall approve such petition
16 within 60 days unless it finds that such competitive classification is
17 contrary to the public interest.¹
18

19 In conducting the 60-day review, the statute permits the Commission to consider
20 data pertinent in a 30-day review (e.g., the number of carriers providing basic
21 local telecommunications service in an exchange that meet the criteria spelled out
22 in 392.245.5(1)-(5)). But the relevant and mandatory inquiry is much broader: 60-
23 day petitions can be based on competition from any entity providing local voice
24 service in whole or in part by using its own telecommunications facilities or other
25 facilities or the telecommunications facilities or other facilities of a third party,
26 including those of the incumbent local exchange company as well as providers
27 that rely on an unaffiliated third party Internet service. Thus, for the 60-day
28 investigation, the Commission must consider service being provided by:

- 1 • Companies providing service using their own facilities;
- 2 • Companies providing service using their own facilities and facilities of the
- 3 ILEC;
- 4 • Companies providing service using their own facilities and facilities from an
- 5 unaffiliated carrier;
- 6 • Wireless carriers;
- 7 • Companies providing service using facilities from an unaffiliated carrier (e.g.,
- 8 another CLEC) and facilities from the ILEC;
- 9 • Companies providing service using only facilities from the ILEC (either
- 10 through UNE-P or a commercial agreement);

11

12 As one can see, the focus is on ensuring the customer has a choice of service

13 providers. The intent is clear. The legislature created a simplified manner for

14 obtaining a competitive classification – one which requires the Commission to

15 grant a competitive classification unless it finds that such classification is contrary

16 to the public interest.

17

18 **Q. SB 237 REQUIRES THE COMMISSION TO GRANT THE REQUESTED**

19 **COMPETITIVE CLASSIFICATION UNLESS THE COMMISSION FINDS**

20 **THAT DOING SO WOULD BE CONTRARY TO THE PUBLIC**

21 **INTEREST. WOULD GRANTING SBC MISSOURI'S REQUEST FOR**

¹ Section 392.245.5.

1 **COMPETITIVE CLASSIFICATION IN THIS CASE BE CONTRARY TO**
2 **THE PUBLIC INTEREST?**

3 A. No. SB 237 makes clear the legislature intends for competitive classifications to
4 be granted. For the 60 day process, Section 392.245.5 requires the Commission
5 to grant competitive classification unless the Commission finds it is contrary to
6 the public interest. The legislature has already determined that the competitive
7 marketplace is preferable to the asymmetric regulation that exists today so unless
8 a party produces a very compelling reason why a competitive classification is
9 contrary to the public interest, the law requires the Commission to grant the
10 requested competitive classification. Staff has presented no such evidence.

11

12 **Q. IS STAFF’S POSITION THAT SBC MISSOURI MUST DEMONSTRATE**
13 **THAT ITS REQUEST IS IN THE PUBLIC INTEREST (VAN ESCHEN**
14 **DIRECT, P. 18-19) CONSISTENT WITH THE STATUTE?**

15 A. No. Staff’s position is inconsistent with this approach. Staff erroneously claims
16 that the party seeking the competitive classification must prove why its request is
17 in the public interest. Staff has it backwards. The legislature has already
18 determined that competitive classification must be granted unless the Commission
19 finds that it is contrary to the public interest. Clearly, Staff’s position must be
20 rejected because it is inconsistent with the law.

21

22 **Q. HOW DOES SB 237 CHANGE THE PROCESS FOR GAINING**
23 **COMPETITIVE CLASSIFICATIONS?**

1 A. SB 237 reinforces the legislature's intent to allow full and fair competition to
2 function instead of regulation where the statutory criteria are met.² Among other
3 things, SB 237 creates a simplified manner in which competitive classification
4 requests are to be evaluated. Prior to SB 237, the Commission was required to
5 determine if "effective competition" existed in the exchange. This led to a
6 service-by-service analysis where the Commission examined the "extent" of
7 competition, made pricing comparisons and assessed service comparability. The
8 process established by SB 237, however, simply requires the Commission to
9 determine if choice is available in the exchange. The new law recognizes that as
10 long as customers have the ability to choose an alternative provider of voice
11 service other than the ILEC, customers are better served by letting competitive
12 forces manage the marketplace. Once customers have choice, the law makes clear
13 that competitive classification must be granted.

14
15 **SBC MISSOURI'S REQUEST FOR COMPETITIVE CLASSIFICATION MEETS**
16 **THE SIMPLIFIED 60 DAY PROCESS CRITERIA**

17 **Q. WHAT IS SBC MISSOURI SEEKING IN THIS CASE?**

18 A. SBC Missouri seeks a competitive classification for each of the 49 residential
19 exchanges and for each of the 26 business exchanges (out of 160 total exchanges)
20 that were identified in the 60 day portion of SBC Missouri's Petition to the extent
21 these exchanges were not classified as competitive in Case No. TO-2006-0093
22 (SBC Missouri's 30 day case). In addition, SBC Missouri seeks competitive

² SB 237 was overwhelmingly passed by both the Missouri Senate (29 to 3) and House of Representatives

1 classification of any exchanges where SBC Missouri sought, but did not receive,
2 competitive classification in Case No. TO-2006-0093. I have attached the
3 following exhibits which identify the exchanges where SBC Missouri seeks a
4 competitive classification under the 60 day criteria plus information regarding the
5 competitors operating in those exchanges:

6 Revised Exhibit B-1, which identifies for each SBC Missouri exchange for
7 which competitive classification is being sought under the 60-day trigger,
8 the minimum number of carriers providing local voice service to business
9 customers using each of the following methods of providing service:

- 10 • Use of wholesale services from SBC Missouri (i.e., replacement
- 11 for UNE-P) under a commercial agreement;
- 12 • UNE-P from SBC Missouri;
- 13 • Wireless carrier;
- 14 • VoIP provider using a third-party's network.

15
16 Revised Exhibit B-2, which identifies for each SBC Missouri exchange for
17 which competitive classification is being sought under the 60-day trigger,
18 the minimum number of carriers providing local voice service to
19 residential customers using each of the following methods of providing
20 service:

- 21 • Use of wholesale services from SBC Missouri (i.e., replacement
- 22 for UNE-P) under a commercial agreement;
- 23 • UNE-P from SBC Missouri;
- 24 • Wireless carrier;
- 25 • VoIP provider using a third-party's network.

26
27 Exhibit B-3, which is a map geographically depicting the exchanges
28 identified in Exhibit B-1;

29
30 Exhibit B-4, which is a map geographically depicting the exchanges
31 identified in Exhibit B-2.

32
33 These are the exhibits, including the same exhibit names, that were included in
34 SBC Missouri's Petition.³

(155 to 3), was signed by the Governor, and became law on August 28, 2005.

³ The Highly Confidential "(HC)" designation has been removed from the exhibit name since the information originally labeled as Highly Confidential has been declassified pursuant to the Commission's Order in this case. Exhibit B-1 has been revised to identify the correct number of CLECs with commercial

1

2 **Q. WHICH COMPANIES DID SBC MISSOURI EXCLUDE FROM THE 60**
3 **DAY EVIDENCE?**

4 A. The data in SBC Missouri's exhibits reflect only a minimum number of
5 competitors in each of the designated exchanges since there may be
6 additional competitors who are providing service in the exchange. For
7 example, SBC Missouri has examined only six VoIP providers (which use
8 a third-party's network) and only counted those VoIP providers in
9 exchanges where cable modem service is available (i.e., excluding DSL)
10 and only if the customer in that exchange can port their telephone number
11 or obtain a new local telephone number in the exchange. SBC Missouri's
12 data only counts wireless carriers who use their own facilities (ignoring
13 Mobile Virtual Network Operators, or MVNOs, such as Virgin Mobile)
14 and it does not include any competitive services currently being offered by
15 AT&T or its affiliates, prepaid carriers or resellers. SBC Missouri also
16 only counted CLECs with active customers in the exchange. There are
17 many more CLECs whose tariffs indicate they are willing to provide
18 service in the requested exchanges. The information presented also
19 excludes SBC Missouri affiliates, such as Cingular Wireless.

20

agreements in the Marshall exchange and Exhibit B-2 has been revised to identify the correct number of CLECs with commercial agreements in the Festus exchange. The exhibits included in SBC Missouri's Petition undercounted the CLECs with commercial agreements in these two exchanges.

1 **Q. EVEN AFTER ELIMINATING VARIOUS COMPETITORS, ARE THERE**
2 **STILL A SIGNIFICANT NUMBER OF COMPETITORS IN EACH OF**
3 **THE REQUESTED EXCHANGES?**

4 A. Yes. As can be seen by Exhibits B-1 and B-2, there are a substantial number of
5 competitors in each of the SBC Missouri exchanges where competitive
6 classification is requested. The fewest competitors identified in any exchange is
7 five. Most exchanges have significantly more.

8
9 **Q. STAFF POINTS OUT THAT SBC MISSOURI DID NOT NAME ITS**
10 **COMPETITORS (P. 18) AND CLAIMS THAT COMPANIES SHOULD BE**
11 **REQUIRED TO IDENTIFY THEIR COMPETITORS BY NAME (P. 19).**
12 **DID STAFF ASK SBC MISSOURI FOR THE NAMES OF THE**
13 **COMPETITORS QUANTIFIED IN EXHIBITS B-1 AND B-2?**

14 A. No.

15
16 **Q. IS IT NECESSARY FOR SBC MISSOURI TO NAME COMPETITORS IN**
17 **EACH OF THE REQUESTED EXCHANGES?**

18 A. No. I do not believe the names of the competitors are relevant. The exhibits SBC
19 Missouri has presented quantify the minimum number of competitors separated
20 into different provisioning types (i.e., via commercial agreements, UNE-P,
21 wireless and VoIP). This evidence demonstrates that there are a significant
22 number of competitors in each of the requested exchanges, which clearly satisfies

1 the legislative criteria for granting a competitive classification under the 60 day
2 process.

3

4 **Q. HAVE YOU, NONETHELESS, CHOSEN TO PROVIDE THE NAMES OF**
5 **THE COMPETITORS IN YOUR TESTIMONY?**

6 A. Yes. I have attached two tables that identify, for each of the requested exchanges,
7 the names of the CLECs with lines in the exchange which are operating under a
8 commercial agreement, the names of the CLECs with lines in the exchange that
9 are using UNE-P, the names of the wireless carriers providing service in the
10 exchange, and the names of selected VoIP providers that rely on a third-party's
11 network.⁴ These are the names of the competitors that equate to the numbers that
12 are presented in Exhibits B-1 and B-2. As I mentioned above, these represent a
13 minimum number of competitors in these exchanges for the reasons I explained.

14

15 **Q. DO THE TABLES IN UNRUH - SCHEDULE 2(HC) AND UNRUH –**
16 **SCHEDULE 3(HC) PROVIDE ANY ADDITIONAL INFORMATION**
17 **BEYOND THE NAMES OF THE COMPETITORS?**

18 A. Yes. The tables also identify the CLECs that have their own switching
19 equipment. So, while the CLECs are using SBC Missouri's switching facilities,
20 either through UNE-P or through a commercial agreement, to provide service in
21 the identified exchanges, many also have their own switching facilities that could
22 be used to provide service in the identified exchanges.

1

2 **Q. STAFF LIMITS ITS RECOMMENDATIONS TO ONLY SUPPORTING**
3 **THE EXCHANGES THAT MEET THE 30 DAY CRITERIA (P. 2). IS**
4 **THIS CONSISTENT WITH THE LAW?**

5 A. No. Staff ignores competition from CLECs that are not using their own facilities
6 in whole or in part, competition from wireless carriers and competition from VoIP
7 providers in its 60 day analysis. This is contrary to the law which requires the
8 Commission to consider competition from:

9 any entity providing local voice service in whole or in part by
10 using its own telecommunications facilities or other facilities or the
11 telecommunications facilities or other facilities of a third party,
12 including those of the incumbent local exchange company as well
13 as providers that rely on an unaffiliated third-party Internet
14 service.⁵
15

16 There are CLECs that choose to use SBC Missouri's facilities rather than build
17 their own. That is their choice and their choice does not make them any less of a
18 competitor capable of serving customers in the exchange. For example, Sage has
19 chosen to enter into a commercial agreement with SBC Missouri to purchase a
20 UNE-P replacement service whereby Sage uses SBC Missouri's facilities (e.g.,
21 loops and switching) to enable Sage to provide service to its customers. Sage
22 chose to take this approach to serving its customers rather than deploying its own
23 facilities (such as its own switches) and signed a seven year agreement to

⁴ See Unruh – Schedule 2(HC) for the names of the competitors for business services and Unruh – Schedule 3(HC) for the names of the competitors for residential services.

⁵ Section 392.245.5 (emphasis added).

1 purchase services from SBC Missouri. Other companies have also signed similar
2 commercial agreements.

3

4 **Q. WHAT CONCLUSION DO YOU DRAW FROM STAFF'S POSITION IN**
5 **THIS CASE?**

6 A. Staff does not support competitive classification in the 60 day case unless the
7 evidence meets the criteria applicable to a request under the 30 day track. As I
8 indicated above, this is not consistent with the statute. Staff appears to continue
9 to believe that regulation is the preferred avenue rather than permitting
10 competitive markets to work. I believe this philosophy and the slow-pace at
11 which we were moving to fully competitive markets is why the legislature
12 decided to change the law. The legislature recognizes and re-emphasized that
13 competition is preferable to regulation and that is why the law was changed to
14 create an environment where competitive classifications were to be granted unless
15 there was some very compelling reason not to do so. The Commission should
16 recognize this changed environment and follow the legislative directive.

17

18 **Q. DOES SBC MISSOURI'S REQUEST FOR COMPETITIVE**
19 **CLASSIFICATION IN THE IDENTIFIED EXCHANGES MEET THE 60**
20 **DAY STATUTORY CRITERIA?**

21 A. Yes. Customers have choices among several providers in each of the requested
22 exchanges. The legislature simply wants to ensure that customers have a choice.
23 Once customers have choice, then the competitive marketplace should be

1 permitted to work. The Commission should grant competitive classification in
2 each of the requested exchanges that have not already been granted a competitive
3 classification in SBC Missouri's 30 day case (TO-2005-0093) by October 29,
4 2005 (i.e., within 60 days of the request). In addition, as requested by SBC
5 Missouri in its Petition, the Commission should also grant competitive
6 classification in any exchanges requested in SBC Missouri's 30 day case that the
7 Commission finds did not meet the 30 day statutory criteria.

8

9 **SUMMARY**

10 **Q. PLEASE SUMMARIZE YOUR TESTIMONY.**

11 A. My testimony has explained that SB 237 significantly alters the manner in which
12 competitive classification requests are to be reviewed. The legislature has created
13 a simplified approach where the Commission is to grant a competitive
14 classification unless there is a compelling reason why the request is contrary to
15 the public interest. The Commission is not to determine whether there is
16 "effective competition" or examine the "extent" of competition, make pricing
17 comparisons, or assess service comparability as it did under the old statutory
18 framework. The process now focuses on "choice." The legislature recognizes
19 that as long as customers have a choice then competition is preferable to
20 regulation for managing the marketplace. The exchanges requested by SBC
21 Missouri meet the statutory criteria and the Commission should grant a
22 competitive classification for these exchanges by October 29, 2005 (i.e., within 60
23 days of the request).

1

2 **Q. DOES THIS CONCLUDE YOUR TESTIMONY?**

3 **A. Yes, it does.**

1 **SUMMARY OF EDUCATION, WORK EXPERIENCE AND QUALIFICATIONS**

2
3
4 **Q. PLEASE SUMMARIZE YOUR PROFESSIONAL AND EDUCATIONAL**
5 **BACKGROUND?**

6 A. I received a Bachelor of Science in Computer Science from Kansas State
7 University in 1986. I received a Master of Business Administration from
8 Washington University in St. Louis in 1995. I have been employed by SBC
9 Missouri since 1986 and have held several positions in the company mostly
10 working in the regulatory area. I have worked on regulatory issues at both the
11 federal and state level.
12

13 **Q. HAVE YOU PREVIOUSLY TESTIFIED BEFORE THIS COMMISSION?**

14 A. Yes, I have previously testified in the following Missouri cases:
15 • Missouri Case No. TO-98-212, In the Matter of the Investigation into the
16 Exhaustion of Central Office Codes in the 314 Numbering Plan Area
17 • Missouri Case No. TO-97-217, In the Matter of an Investigation Concerning
18 the Continuation or Modification of the Primary Toll Carrier Plan (PTC)
19 When IntraLATA Presubscription is Implemented in Missouri
20 • Missouri Case No. TO-99-14, In the Matter of the Implementation of Number
21 Conservation Methods in the St. Louis, Missouri Area
22 • Missouri Case No. TO-99-254, et al., In the Matter of an Investigation
23 Concerning the Primary Toll Carrier Plan and IntraLATA Dialing Parity
24 • Missouri Case No. TO-99-483, In the Matter of an Investigation for the
25 Purpose of Clarifying and Determining Certain Aspects Surrounding the

Provisioning of Metropolitan Calling Area Service after the Passage and
Implementation of the Telecommunications Act of 1996

- Missouri Case No. TR-2001-344, In the Matter of Northeast Missouri Rural Telephone Company's Rate Case in Compliance with the Commission's Orders in TO-99-530 and TO-99-254
- Missouri Case No. TO-98-329, Investigation into Various Issues Relating to the Missouri Universal Service Fund
- Missouri Case No. TT-2002-227, et al., In the Matter of Southwestern Bell Telephone Company's Proposed Revisions to PSC MO No. 26, Long Distance Message Telecommunications Service Tariff
- Missouri Case No. TR-2001-65, Investigation of actual costs incurred in providing exchange access service and the access rates to be charged by competitive local exchange telecommunications companies
- Missouri Case No. IT-2004-0015, In the Matter of Southwestern Bell Telephone Company, d/b/a SBC Missouri's Proposed Revised Tariff Sheet Intended to Increase by Eight Percent the Rates for Line Status Verification and Busy Line Interrupt as Authorized by Section 392.245, RSMo, the Price Cap Statute
- Missouri Case No. TO-2005-0035, In the Matter of The Second Investigation into the State of Competition in the Exchanges of Southwestern Bell Telephone, L. P., d/b/a SBC Missouri

- 1 • Missouri Case No. TO-2006-0093, In the Matter of the Request of
- 2 Southwestern Bell Telephone, L.P., d/b/a SBC Missouri, for Competitive
- 3 Classification Pursuant to Section 392.245.6, RSMo 2005 – 30 day Petition.