

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

|                                              |   |                |
|----------------------------------------------|---|----------------|
| In the Matter of Southwestern Bell Telephone | ) |                |
| Company, d/b/a AT&T Missouri's Application   | ) |                |
| For a Commission Finding that 55% of AT&T    | ) | Case No. _____ |
| Missouri's Total Subscriber Access Lines are | ) |                |
| In Exchanges where Its Services have been    | ) |                |
| Declared Competitive.                        | ) |                |

**AT&T MISSOURI'S APPLICATION FOR DECLARATION  
OF COMPETITIVE STATUS**

AT&T Missouri,<sup>1</sup> pursuant to Section 392.245.5(7) of House Bill 1779 ("HB 1779"), respectfully requests the Missouri Public Service Commission ("Commission") to make a finding that 55% or more of AT&T Missouri's total subscriber access lines are in exchanges where its services have been declared competitive, and to deem AT&T Missouri to be a competitive company under the statute.

**Executive Summary**

In 2005, the Commission granted AT&T Missouri competitive classification for business service in 75 exchanges and for residential service in 77 exchanges<sup>2</sup>. In July 2007, the Commission reaffirmed the competitive classification for these exchanges. AT&T Missouri's subscriber access lines in these competitively classified exchanges constitute over 90% of its total subscriber access lines, substantially more than the statutorily-prescribed 55%. Having met the statutory test in HB 1779 for competitive classification, the Commission should deem AT&T Missouri a competitive company.

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<sup>1</sup> Southwestern Bell Telephone Company, d/b/a AT&T Missouri, will be referred to in this pleading as "AT&T Missouri."

<sup>2</sup> In fact, many more of AT&T Missouri's non-competitive exchanges meet the competitive criteria under 392.245. AT&T Missouri, however, did not previously seek competitive classification for these exchanges.

### **Applicant Background**

1. AT&T Missouri is a Missouri corporation with its principal Missouri office at One AT&T Center, Room 3520, St. Louis, Missouri 63101. It may be contacted at the regular and electronic mail addresses and telephone and facsimile numbers of its attorneys, as set out under the signature block of this Application. AT&T Missouri is authorized to do business in Missouri<sup>3</sup> and its fictitious name is duly registered with the Missouri Secretary of State.<sup>4</sup> AT&T Missouri is a "local exchange telecommunications company" and a "public utility," and is duly authorized to provide "telecommunications service" within the State of Missouri, as each of those phrases is defined in Section 386.020, RSMo 2000.<sup>5</sup>

2. All correspondence, pleadings, orders, decisions, and communications regarding this proceeding should be sent to:

Timothy P. Leahy  
Leo J. Bub  
Robert J. Gryzmala  
Attorneys for Southwestern Bell Telephone Company,  
d/b/a AT&T Missouri  
One AT&T Center, Room 3518  
St. Louis, Missouri 63101

3. AT&T Missouri has no final unsatisfied judgments or decisions against it from any state or federal agency or court, which involve retail customer service or rates, which action, judgment or decision has occurred within three (3) years of the date of this Application. Moreover, AT&T Missouri has no pending actions which satisfy the listed criteria in Arkansas,

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<sup>3</sup> In accordance with 4 CSR 240-2.060(1)(B) and (G), a certified copy of Southwestern Bell Telephone Company's Certificate of Good Standing from the Missouri Secretary of State was filed with the Commission on August 15, 2007, in Case No. IK-2008-0044.

<sup>4</sup> In accordance with 4 CSR 240-2.060(1)(E) and (G), a copy of the registration of the fictitious name "AT&T Missouri" was filed with the Commission on July 17, 2007, in Case No. TO-2002-185.

<sup>5</sup> Following its June 26, 2007, Order in Case No. TO-2002-185 allowing Southwestern Bell Telephone, L.P., d/b/a AT&T Missouri, to alter its status from a Texas limited partnership to a Missouri corporation, the Commission approved tariff revisions to reflect the new corporate name, Southwestern Bell Telephone Company d/b/a AT&T Missouri. See, Order Granting Expedited Treatment and Approving Tariffs, Case No. TO-2002-185, issued June 29, 2007.

Kansas, Missouri or Oklahoma. AT&T Missouri (which operates in Texas under the fictitious name AT&T Texas) has six pending formal complaints or lawsuits from end-user customers in Texas which involve retail customer service or rates.<sup>6</sup>

4. AT&T Missouri does not have any annual reports or assessment fees that are overdue in Missouri.

### **HB 1779**

5. Governor Blunt signed HB 1779 on July 11, 2008 and it became effective on August 28, 2008. Under Section 392.245.5(7) of the legislation, an incumbent local exchange carrier will be deemed competitive and no longer subject to price cap regulation once the Commission makes a finding that 55% or more of the company's total subscriber access lines are in exchanges where the company's services have been designated as "competitive." Specifically, Section 392.245.5(7) states:

Upon a finding that fifty-five percent or more of an incumbent local exchange telecommunications company's total subscriber access lines are in exchanges where such company's services have been declared competitive, the incumbent local exchange telecommunications company shall be deemed competitive and shall no longer be subject to price-cap regulation, except that rates charged for basic local telecommunications service in exchanges that were noncompetitive immediately prior to this finding can be increased to a rate that is no higher than the statewide average rate for basic local telecommunications service in the incumbent local exchange company's competitively classified exchanges for a period of four years. During the four year period, any annual increase in rates for residential basic local telecommunications service shall not exceed two dollars per line per month. Rates charged for exchange access service by an incumbent local exchange telecommunications company deemed competitive shall not exceed the rates charged at the time the company was deemed competitive.

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<sup>6</sup> The pending lawsuits in Texas involving customer service or rates are (1) Irving's Holding, Inc. v. SBC Communications, Inc., Docket No. CC-05-07415-C and (2) David Lavine, M.D. and David Lavine, M.D., P.A. d/b/a Center for Cosmetic and Reconstructive Surgery v. AT&T Inc., Cause No. 07-54771-2. The pending formal complaints before the Texas Public Utility Commission involving customer service or rates are as follows: (1) Complaint of Harris County Hospital District Against AT&T Texas, Docket No. 34332; (2) Complaint of Harris County Hospital District Against AT&T Texas, Docket No. 34940; (3) Complaint of Harris County Hospital District Against AT&T Texas, Docket No. 35363; and (4) Complaint of John J. Gitlin, Esq. Against AT&T Texas, Docket No. 34348.

### **AT&T Missouri Satisfies the 55% Threshold**

6. The Commission in Case No. TO-2006-0093 granted AT&T Missouri competitive classification under the “30-day track”<sup>7</sup> of Section 392.245.5, RSMo for business services in 45 exchanges and for residential services in 26 exchanges. In Case No. TO-2006-0102, the Commission granted AT&T Missouri competitive classification under the “60-day track”<sup>8</sup> of Section 392.245.5 for business services in 30 exchanges and for residential services in 51 exchanges.

7. In July, 2007, the Commission reaffirmed the competitive status of AT&T Missouri’s competitively classified exchanges in Case No. TO-2007-0053. The Commission opened that case with Staff’s filing of its report on the comprehensive investigation it conducted on the continued appropriateness of competitive classification for AT&T Missouri’s competitively classified exchanges. In that report, Staff opined that “competitive conditions continue to exist in all of AT&T Missouri’s exchanges with competitive classification.”<sup>9</sup> Office of the Public Counsel, AT&T Missouri and Staff submitted prefiled testimony and the Commission conducted a hearing with full post-hearing briefing. Based on that record, the Commission found that the conditions of Section 392.245.5 for competitive classification continue to exist in each exchange it had previously designated as competitive:

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<sup>7</sup> The “30-day track” requires that the Commission designate the business and/or residential service in an exchange as competitive within 30 days of a request if the Commission finds that “two nonaffiliated entities in addition to the incumbent local exchange company are providing basic local telecommunications service to [business and/or] residential customers within the exchange.” One wireless provider shall be counted, as shall any entity “providing local voice service in whole or in part over . . . facilities in which it or one of its affiliates have an ownership interest.” Section 392.245.5(2).

<sup>8</sup> The “60-day track” required that the Commission designate the business and/or residential services in an exchange as competitive within 60 days of their request if the Commission finds the two entities providing the appropriate type of services to customers within the exchange, unless the Commission “finds that such competitive classification is contrary to the public interest.” Section 392.245.5(6). HB 1779 has since modified this test by removing the “not contrary to the public interest” language. Under the “60-day track,” the competitor may be “using its own . . . facilities . . . or the . . . facilities of a third party, including those of the incumbent local exchange company as well as providers that rely on an unaffiliated third-party Internet service.” Section 392.245.5(6).

<sup>9</sup> Staff Report, filed August 8, 2006, in Case No. TO-2006-0053, Memorandum at p. 7.

The Commission determines that all of the previous 30-day exchanges continue to have the requisite number of facilities-based, “other resale,” and wireless carriers to meet the 30-day criteria. In addition, the Commission determines that 27 of the 30 60-day business exchanges and 27 of the 51 60-day residential exchanges meet the 30-day requirements. Furthermore, the remaining three 60-day business and 24 60-day residential exchanges meet the 60-day criteria with regard to the requisite numbers of facilities-based and/or “other resale” providers. It is not contrary to the public interest to continue with the competitive designation in any of the exchanges. The previously designated exchanges of AT&T Missouri shall remain so designated.<sup>10</sup>

8. As demonstrated in the Affidavit of Craig A. Unruh, Executive Director-Regulatory for AT&T Missouri, appended as Attachment 1 (with an HC schedule), the access lines in AT&T Missouri exchanges that have been designated as competitive by the Commission constitute over 90% of AT&T Missouri’s total subscriber access lines.

### **Tariffs**

9. Staff has indicated a preference that competitive carrier tariffs contain a statement on the cover page that the carrier “operates as a competitive telecommunications company.” AT&T Missouri intends to do so. AT&T Missouri, however, appreciates the Commission’s present situation, given its current workload and limited resources, and the number of filings carriers might make on or around August 28, 2008. Therefore, unless otherwise directed by the Commission or requested by Staff, AT&T Missouri will make its administrative tariff filings to add this statement to its tariff cover pages following the issuance of the Commission’s Order granting AT&T Missouri’s application.

### **Conclusion**

Having shown that 55% or more of its total subscriber access lines are in exchanges where its services have been declared competitive, AT&T Missouri satisfies the statutory standard to be deemed competitive under HB 1779.

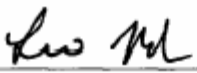
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<sup>10</sup> In the Matter of the Review of the Competitive Classification of the Exchanges of Southwestern Bell Telephone, L.P., d/b/a/ AT&T Missouri, Case No. TO-2007-0053, issued July 12, 2007 at p. 25.

WHEREFORE, AT&T Missouri respectfully requests that the Commission issue an order (1) finding that 55% or more of AT&T Missouri's total subscriber access lines are in exchanges where its services have been declared competitive; and (2) deeming AT&T Missouri a competitive company and no longer subject to price cap regulation pursuant to Section 392.245.5(7) of HB 1779.

Respectfully submitted,

SOUTHWESTERN BELL TELEPHONE COMPANY,  
D/B/A AT&T MISSOURI

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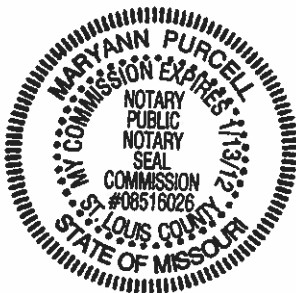
CITY OF ST. LOUIS       )  
                                      )  
STATE OF MISSOURI       )       SS

**VERIFICATION**

I, Craig A. Unruh, being duly sworn upon my oath, state that I am over twenty-one, sound of mind, and Executive Director-Regulatory of AT&T Services, Inc. I am authorized to act on behalf of Southwestern Bell Telephone Company, d/b/a AT&T Missouri regarding the foregoing document. I have read it and verify that the facts contained in it are true and correct according to the best of my knowledge, information and belief.

  
\_\_\_\_\_  
Craig A. Unruh

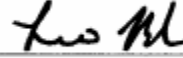
Sworn and subscribed to before me this 28th day of August, 2008.



  
\_\_\_\_\_  
Notary Public

**CERTIFICATE OF SERVICE**

Copies of this document were served on the following parties by e-mail on August 28, 2008.



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Leo J. Bub

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

In the Matter of Southwestern Bell Telephone Company, d/b/a AT&T Missouri's Application For a Commission Finding that 55% of AT&T Missouri's Total Subscriber Access Lines are In Exchanges where Its Services have been Declared Competitive.

Case No. \_\_\_\_\_

**AFFIDAVIT OF CRAIG A. UNRUH**

STATE OF MISSOURI                    )  
                                                  )  
CITY OF ST. LOUIS                    )                    SS

I, Craig A. Unruh, of lawful age, being duly sworn, depose and state:

1. My name is Craig A. Unruh. I am Executive Director-Regulatory for AT&T Services, Inc. I am responsible for advocating regulatory policy and managing AT&T Missouri's regulatory organization.
2. I have submitted this affidavit in support of AT&T Missouri's Application to the Missouri Public Service Commission ("Commission") for a finding that 55% or more of AT&T Missouri's total subscriber access lines are in exchanges where its services have been declared competitive, and to deem AT&T Missouri to be a competitive company under Section 392.245.5(7) as amended by House Bill 1779 ("HB 1779").
3. I have attached to this affidavit, as Schedule 1(HC), a spreadsheet we prepared showing that 94% of AT&T Missouri's subscriber access lines are located in exchanges previously designated by the Commission as competitive for the respective service. Specifically, this Schedule shows:

Column 1 - the exchange name.

**Column 2 - the number of residence subscriber access lines in the exchange.**

Column 3 - the number of business subscriber access lines in the exchange.

Column 4 - the aggregated total number of business and residence subscriber access lines in the exchange (Column 2 plus Column 3).

Column 5 - whether the Commission has designated the exchange as competitive for residence services (competitive exchanges designated with an "x").

Column 6 - whether the Commission has designated the exchange as competitive for business services (competitive exchanges designated with an "x").

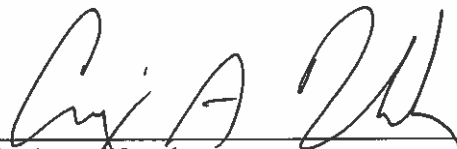
Column 7 - the residence subscriber access line count in each exchange previously designated by the Commission as competitive for residence services (repeats the number in Column 2 if the exchange has been designated as competitive for the service; shows zero if it has not been so designated).

Column 8 - the business subscriber access line count in each exchange previously designated by the Commission as competitive for business services (repeats the number in Column 3 if the exchange has been designated as competitive for the service; shows zero if it has not been so designated).

Columns 2 through 8 are totaled at the bottom of the Schedule

4. The bottom of Schedule 1(HC) shows how we calculated that 94% of AT&T Missouri's total subscriber access lines are located in exchanges competitively classified for the respective service. It shows that we added the total of Column 7 to the total of Column 8 and divided the sum by the total of Column 4.
5. We have filed this Schedule as "Highly Confidential." Access line information disaggregated in this fashion and provided at this level of geographical detail is very competitively sensitive. It reveals the number of access lines a carrier serves on a very specific and localized geographic basis. Accordingly, this information falls squarely within Section A(3) of the "Highly Confidential" classification of the Commission's Standard Protective Order: "market-specific information relating to services offered in competition with others," and Section (1)(A) of the Commission's rules governing confidential information, 4 CSR 240-2.135(1)(A). This internal market-share information has been developed at great expense and is closely guarded. If made public, this type of information would make carriers more vulnerable to the marketing efforts of their competitors. As a result, access line information at the exchange level of detail is kept confidential by carriers in the industry and is not available to the public in any format.
6. Schedule 1(HC) was prepared at my direction and under my direct supervision. It is true and correct to the best of my knowledge, information and belief.

Further affiant sayeth not.

  
Craig A. Dnruh

Subscribed and sworn to before me this 28<sup>th</sup> day of August, 2008.

  
Notary Public

My Commission Expires: January 13, 2012



AT&T Missouri  
Subscriber Access Line Counts in Competitively Classified Exchanges  
July, 2008

| Exchange Name       | Subscriber Access Line Counts<br>by Exchange |          |       | Competitive Status of<br>Exchange(1) |          | Subscriber Access Line<br>Counts in Competitive<br>Exchanges |          |
|---------------------|----------------------------------------------|----------|-------|--------------------------------------|----------|--------------------------------------------------------------|----------|
|                     | Residence                                    | Business | Total | Residence                            | Business | Residence                                                    | Business |
| ADRIAN              | **                                           | **       | **    |                                      |          | 0                                                            | 0        |
| ADVANCE             | **                                           | **       | **    | X                                    |          | **                                                           | **       |
| AGENCY              | **                                           | **       | **    |                                      |          | 0                                                            | 0        |
| ALTENBURG-FROHNA    | **                                           | **       | **    |                                      |          | 0                                                            | 0        |
| ANTONIA             | **                                           | **       | **    | X                                    | X        | **                                                           | **       |
| ARCHIE              | **                                           | **       | **    | X                                    | X        | **                                                           | **       |
| ARGYLE              | **                                           | **       | **    |                                      |          | 0                                                            | 0        |
| ARMSTRONG           | **                                           | **       | **    |                                      |          | 0                                                            | 0        |
| ASH GROVE           | **                                           | **       | **    | X                                    | X        | **                                                           | **       |
| BEAUFORT            | **                                           | **       | **    |                                      |          | 0                                                            | 0        |
| BELL CITY           | **                                           | **       | **    | X                                    |          | **                                                           | **       |
| BENTON              | **                                           | **       | **    |                                      |          | 0                                                            | 0        |
| BILLINGS            | **                                           | **       | **    | X                                    | X        | **                                                           | **       |
| BISMARCK            | **                                           | **       | **    |                                      |          | 0                                                            | 0        |
| BLOOMFIELD          | **                                           | **       | **    |                                      |          | 0                                                            | 0        |
| BLOOMSDALE          | **                                           | **       | **    |                                      |          | 0                                                            | 0        |
| BONNE TERRE         | **                                           | **       | **    | X                                    | X        | **                                                           | **       |
| BOONVILLE           | **                                           | **       | **    | X                                    | X        | **                                                           | **       |
| BOWLING GREEN       | **                                           | **       | **    |                                      |          | 0                                                            | 0        |
| BROOKFIELD          | **                                           | **       | **    |                                      |          | 0                                                            | 0        |
| CAMDENTON           | **                                           | **       | **    | X                                    | X        | **                                                           | **       |
| CAMPBELL            | **                                           | **       | **    |                                      |          | 0                                                            | 0        |
| CAPE GIRARDEAU      | **                                           | **       | **    | X                                    | X        | **                                                           | **       |
| CARDWELL            | **                                           | **       | **    |                                      |          | 0                                                            | 0        |
| CARL JUNCTION       | **                                           | **       | **    |                                      |          | 0                                                            | 0        |
| CARROLLTON          | **                                           | **       | **    |                                      |          | 0                                                            | 0        |
| CARTHAGE            | **                                           | **       | **    | X                                    | X        | **                                                           | **       |
| CARUTHERSVILLE      | **                                           | **       | **    |                                      |          | 0                                                            | 0        |
| CEDAR HILL          | **                                           | **       | **    | X                                    | X        | **                                                           | **       |
| CENTER              | **                                           | **       | **    |                                      |          | 0                                                            | 0        |
| CHAFFEE             | **                                           | **       | **    |                                      | X        | 0                                                            | **       |
| CHARLESTON          | **                                           | **       | **    |                                      |          | 0                                                            | 0        |
| CHESTERFIELD        | **                                           | **       | **    | X                                    | X        | **                                                           | **       |
| CHILLICOTHE         | **                                           | **       | **    | X                                    | X        | **                                                           | **       |
| CLARKSVILLE         | **                                           | **       | **    |                                      |          | 0                                                            | 0        |
| CLEVER              | **                                           | **       | **    | X                                    | X        | **                                                           | **       |
| CLIMAX SPRINGS      | **                                           | **       | **    |                                      |          | 0                                                            | 0        |
| DEERING             | **                                           | **       | **    |                                      |          | 0                                                            | 0        |
| DEKALB              | **                                           | **       | **    |                                      |          | 0                                                            | 0        |
| DELTA               | **                                           | **       | **    | X                                    |          | **                                                           | **       |
| DESOTO              | **                                           | **       | **    | X                                    | X        | **                                                           | **       |
| DEXTER              | **                                           | **       | **    | X                                    | X        | **                                                           | **       |
| DOWNING             | **                                           | **       | **    |                                      |          | 0                                                            | 0        |
| EAST PRAIRIE        | **                                           | **       | **    |                                      |          | 0                                                            | 0        |
| EDINA               | **                                           | **       | **    |                                      |          | 0                                                            | 0        |
| ELDON               | **                                           | **       | **    | X                                    | X        | **                                                           | **       |
| ELSBERRY            | **                                           | **       | **    |                                      |          | 0                                                            | 0        |
| ESSEX               | **                                           | **       | **    |                                      |          | 0                                                            | 0        |
| EUREKA              | **                                           | **       | **    | X                                    | X        | **                                                           | **       |
| EXCELSIOR SPRINGS   | **                                           | **       | **    | X                                    | X        | **                                                           | **       |
| FARLEY              | **                                           | **       | **    | X                                    | X        | **                                                           | **       |
| FARMINGTON          | **                                           | **       | **    | X                                    | X        | **                                                           | **       |
| FAYETTE             | **                                           | **       | **    |                                      |          | 0                                                            | 0        |
| FENTON              | **                                           | **       | **    | X                                    | X        | **                                                           | **       |
| FESTUS-CRYSTAL CITY | **                                           | **       | **    | X                                    | X        | **                                                           | **       |
| FISK                | **                                           | **       | **    |                                      |          | 0                                                            | 0        |
| FLAT RIVER          | **                                           | **       | **    | X                                    | X        | **                                                           | **       |

AT&T Missouri  
Subscriber Access Line Counts in Competitively Classified Exchanges  
July, 2008

|                        |    |    |    |    |    |    |   |   |    |    |
|------------------------|----|----|----|----|----|----|---|---|----|----|
| FRANKFORD              | ** | ** | ** | ** | ** | ** |   |   | 0  | 0  |
| FREDERICKTOWN          | ** | ** | ** | ** | ** | ** | X | X | ** | ** |
| FREEBURG               | ** | ** | ** | ** | ** | ** |   |   | 0  | 0  |
| FULTON                 | ** | ** | ** | ** | ** | ** | X | X | ** | ** |
| GIDEON                 | ** | ** | ** | ** | ** | ** |   |   | 0  | 0  |
| GLASGOW                | ** | ** | ** | ** | ** | ** |   |   | 0  | 0  |
| GRAIN VALLEY           | ** | ** | ** | ** | ** | ** | X | X | ** | ** |
| GRAVOIS MILLS          | ** | ** | ** | ** | ** | ** | X | X | ** | ** |
| GRAY SUMMIT            | ** | ** | ** | ** | ** | ** | X | X | ** | ** |
| GREENWOOD              | ** | ** | ** | ** | ** | ** | X | X | ** | ** |
| HANNIBAL               | ** | ** | ** | ** | ** | ** | X | X | ** | ** |
| HARVESTER              | ** | ** | ** | ** | ** | ** | X | X | ** | ** |
| HAYTI                  | ** | ** | ** | ** | ** | ** |   |   | 0  | 0  |
| HERCULANEUM-PEVELY     | ** | ** | ** | ** | ** | ** | X | X | ** | ** |
| HIGBEE                 | ** | ** | ** | ** | ** | ** |   |   | 0  | 0  |
| HIGH RIDGE             | ** | ** | ** | ** | ** | ** | X | X | ** | ** |
| HILLSBORO              | ** | ** | ** | ** | ** | ** | X | X | ** | ** |
| HOLCOMB                | ** | ** | ** | ** | ** | ** |   |   | 0  | 0  |
| HORNERSVILLE           | ** | ** | ** | ** | ** | ** |   |   | 0  | 0  |
| IMPERIAL               | ** | ** | ** | ** | ** | ** | X | X | ** | ** |
| JACKSON                | ** | ** | ** | ** | ** | ** | X | X | ** | ** |
| JASPER                 | ** | ** | ** | ** | ** | ** |   |   | 0  | 0  |
| JOPLIN                 | ** | ** | ** | ** | ** | ** | X | X | ** | ** |
| KANSAS CITY            | ** | ** | ** | ** | ** | ** | X | X | ** | ** |
| KENNETT                | ** | ** | ** | ** | ** | ** | X | X | ** | ** |
| KIRKSVILLE             | ** | ** | ** | ** | ** | ** | X | X | ** | ** |
| KNOB NOSTER            | ** | ** | ** | ** | ** | ** |   |   | 0  | 0  |
| LAKE OZARK-OSAGE BEACH | ** | ** | ** | ** | ** | ** | X | X | ** | ** |
| LAMAR                  | ** | ** | ** | ** | ** | ** |   |   | 0  | 0  |
| LAMONTE                | ** | ** | ** | ** | ** | ** |   |   | 0  | 0  |
| LANCASTER              | ** | ** | ** | ** | ** | ** |   |   | 0  | 0  |
| LEADWOOD               | ** | ** | ** | ** | ** | ** |   |   | 0  | 0  |
| LILBOURN               | ** | ** | ** | ** | ** | ** |   |   | 0  | 0  |
| LINN                   | ** | ** | ** | ** | ** | ** |   | X | 0  | ** |
| LOCKWOOD               | ** | ** | ** | ** | ** | ** |   |   | 0  | 0  |
| LOUISIANA              | ** | ** | ** | ** | ** | ** |   |   | 0  | 0  |
| MACKS CREEK            | ** | ** | ** | ** | ** | ** |   |   | 0  | 0  |
| MALDEN                 | ** | ** | ** | ** | ** | ** |   |   | 0  | 0  |
| MANCHESTER             | ** | ** | ** | ** | ** | ** | X | X | ** | ** |
| MARBLE HILL            | ** | ** | ** | ** | ** | ** |   | X | 0  | ** |
| MARCELINE              | ** | ** | ** | ** | ** | ** |   |   | 0  | 0  |
| MARIONVILLE            | ** | ** | ** | ** | ** | ** | X | X | ** | ** |
| MARSHALL               | ** | ** | ** | ** | ** | ** | X | X | ** | ** |
| MARSTON                | ** | ** | ** | ** | ** | ** |   |   | 0  | 0  |
| MAXVILLE               | ** | ** | ** | ** | ** | ** | X | X | ** | ** |
| META                   | ** | ** | ** | ** | ** | ** |   |   | 0  | 0  |
| MEXICO                 | ** | ** | ** | ** | ** | ** | X | X | ** | ** |
| MOBERLY                | ** | ** | ** | ** | ** | ** | X | X | ** | ** |
| MONETT                 | ** | ** | ** | ** | ** | ** | X | X | ** | ** |
| MONTGOMERY CITY        | ** | ** | ** | ** | ** | ** |   | X | 0  | ** |
| MOREHOUSE              | ** | ** | ** | ** | ** | ** |   |   | 0  | 0  |
| NEOSHO                 | ** | ** | ** | ** | ** | ** | X | X | ** | ** |
| NEVADA                 | ** | ** | ** | ** | ** | ** | X | X | ** | ** |
| NEW FRANKLIN           | ** | ** | ** | ** | ** | ** |   |   | 0  | 0  |
| NEW MADRID             | ** | ** | ** | ** | ** | ** |   |   | 0  | 0  |
| OAK RIDGE              | ** | ** | ** | ** | ** | ** |   |   | 0  | 0  |
| OLD APPLETON           | ** | ** | ** | ** | ** | ** |   |   | 0  | 0  |
| ORAN                   | ** | ** | ** | ** | ** | ** |   |   | 0  | 0  |
| PACIFIC                | ** | ** | ** | ** | ** | ** | X | X | ** | ** |
| PATTON                 | ** | ** | ** | ** | ** | ** |   |   | 0  | 0  |
| PAYNESVILLE            | ** | ** | ** | ** | ** | ** |   |   | 0  | 0  |

AT&T Missouri  
Subscriber Access Line Counts in Competitively Classified Exchanges  
July, 2008

|                                                                                                                                                                           |    |    |    |    |    |     |    |    |    |    |    |
|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----|----|----|----|----|-----|----|----|----|----|----|
| PERRYVILLE                                                                                                                                                                | ** | ** | ** | ** | ** | X   | X  | ** | ** | ** | ** |
| PIERCE CITY                                                                                                                                                               | ** | ** | ** | ** | ** |     |    | 0  |    | 0  |    |
| POCAHONTAS-NEW WELLS                                                                                                                                                      | ** | ** | ** | ** | ** | X   |    | ** | ** |    | 0  |
| POND                                                                                                                                                                      | ** | ** | ** | ** | ** | X   | X  | ** | ** | ** | ** |
| POPLAR BLUFF                                                                                                                                                              | ** | ** | ** | ** | ** | X   | X  | ** | ** | ** | ** |
| PORTAGE DES SIOUX                                                                                                                                                         | ** | ** | ** | ** | ** | X   | X  | ** | ** | ** | ** |
| PORTAGEVILLE                                                                                                                                                              | ** | ** | ** | ** | ** |     |    | 0  |    | 0  |    |
| PUXICO                                                                                                                                                                    | ** | ** | ** | ** | ** |     |    | 0  |    | 0  |    |
| QULIN                                                                                                                                                                     | ** | ** | ** | ** | ** |     |    | 0  |    | 0  |    |
| RICHMOND                                                                                                                                                                  | ** | ** | ** | ** | ** | X   | X  | ** | ** | ** | ** |
| RICHWOODS                                                                                                                                                                 | ** | ** | ** | ** | ** |     |    | 0  |    | 0  |    |
| RISCO                                                                                                                                                                     | ** | ** | ** | ** | ** |     |    | 0  |    | 0  |    |
| RUSHVILLE                                                                                                                                                                 | ** | ** | ** | ** | ** |     |    | 0  |    | 0  |    |
| SAN ANTONIO                                                                                                                                                               | ** | ** | ** | ** | ** | X   |    | ** | ** |    | 0  |
| SCOTT CITY                                                                                                                                                                | ** | ** | ** | ** | ** |     | X  | 0  | ** | ** | ** |
| SEDALIA                                                                                                                                                                   | ** | ** | ** | ** | ** | X   | X  | ** | ** | ** | ** |
| SENATH                                                                                                                                                                    | ** | ** | ** | ** | ** |     |    | 0  |    | 0  |    |
| SIKESTON                                                                                                                                                                  | ** | ** | ** | ** | ** | X   | X  | ** | ** | ** | ** |
| SLATER                                                                                                                                                                    | ** | ** | ** | ** | ** |     |    | 0  |    | 0  |    |
| SMITHVILLE                                                                                                                                                                | ** | ** | ** | ** | ** | X   | X  | ** | ** | ** | ** |
| SPRINGFIELD                                                                                                                                                               | ** | ** | ** | ** | ** | X   | X  | ** | ** | ** | ** |
| ST CHARLES                                                                                                                                                                | ** | ** | ** | ** | ** | X   | X  | ** | ** | ** | ** |
| ST CLAIR                                                                                                                                                                  | ** | ** | ** | ** | ** | X   | X  | ** | ** | ** | ** |
| ST GENEVIEVE                                                                                                                                                              | ** | ** | ** | ** | ** | X   | X  | ** | ** | ** | ** |
| ST JOSEPH                                                                                                                                                                 | ** | ** | ** | ** | ** | X   | X  | ** | ** | ** | ** |
| ST LOUIS                                                                                                                                                                  | ** | ** | ** | ** | ** | X   | X  | ** | ** | ** | ** |
| ST MARYS                                                                                                                                                                  | ** | ** | ** | ** | ** |     |    | 0  |    | 0  |    |
| STANBERRY                                                                                                                                                                 | ** | ** | ** | ** | ** |     |    | 0  |    | 0  |    |
| TRENTON                                                                                                                                                                   | ** | ** | ** | ** | ** |     |    | 0  |    | 0  |    |
| TUSCUMBIA                                                                                                                                                                 | ** | ** | ** | ** | ** |     |    | 0  |    | 0  |    |
| UNION                                                                                                                                                                     | ** | ** | ** | ** | ** | X   | X  | ** | ** | ** | ** |
| VALLEY PARK                                                                                                                                                               | ** | ** | ** | ** | ** | X   | X  | ** | ** | ** | ** |
| VERSAILLES                                                                                                                                                                | ** | ** | ** | ** | ** |     |    | 0  |    | 0  |    |
| VIENNA                                                                                                                                                                    | ** | ** | ** | ** | ** |     |    | 0  |    | 0  |    |
| WALNUT GROVE                                                                                                                                                              | ** | ** | ** | ** | ** | X   |    | ** | ** |    | 0  |
| WARDELL                                                                                                                                                                   | ** | ** | ** | ** | ** |     |    | 0  |    | 0  |    |
| WARE                                                                                                                                                                      | ** | ** | ** | ** | ** | X   | X  | ** | ** | ** | ** |
| WASHINGTON                                                                                                                                                                | ** | ** | ** | ** | ** | X   | X  | ** | ** | ** | ** |
| WEBB CITY                                                                                                                                                                 | ** | ** | ** | ** | ** | X   | X  | ** | ** | ** | ** |
| WELLSVILLE                                                                                                                                                                | ** | ** | ** | ** | ** |     |    | 0  |    | 0  |    |
| WESTPHALIA                                                                                                                                                                | ** | ** | ** | ** | ** |     |    | 0  |    | 0  |    |
| WYATT                                                                                                                                                                     | ** | ** | ** | ** | ** | X   |    | ** | ** |    | 0  |
| (Less non revenue producing lines)(2)                                                                                                                                     |    |    | ** | ** |    |     |    |    | ** | ** | ** |
| TOTALS                                                                                                                                                                    | ** | ** | ** | ** | ** | 77  | 75 | ** | ** | ** | ** |
| Percentage of Total Subscriber Access Lines in Exchanges<br>Classified as Competitive for the Respective Service [(Column 7 +<br>Column 8) / Column 4]                    |    |    |    |    |    | 94% |    |    |    |    |    |
| (1) Competitive exchanges designated with an "x"                                                                                                                          |    |    |    |    |    |     |    |    |    |    |    |
| (2) Unable to separate non-revenue producing lines into exchanges so assumed all are in competitive exchanges; the<br>number is from the AT&T Missouri 2007 Annual Report |    |    |    |    |    |     |    |    |    |    |    |