

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

Northeast Missouri Rural)	
Telephone Company)	
)	
Complainant,)	
)	Case No. IC-2008-0285
v.)	
)	
AT&T Corp.)	
)	
Respondent.)	

**AT&T CORP.'S RESPONSE TO MOTION FOR
SUMMARY DISPOSITION**

AT&T Corp. respectfully submits that no need exists for the Missouri Public Service Commission ("Commission") to make a determination on the underlying liability issue in this case. AT&T Corp., in its Answer, candidly acknowledged that the FCC had ruled against it on its assertion that enhanced prepaid calling card service constituted an information service and not a telecommunication service. Accordingly, AT&T acknowledged that

intrastate access charges applied to the service when used for calls that originate and terminate within the same state; and that as a result, AT&T Corp. owed Northeast the difference between its interstate and intrastate access rates for intrastate calls made through AT&T's enhanced prepaid calling cards service that originated or terminated in Northeast's exchanges.¹

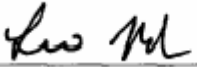
Based on the posture of the pleadings as framed by Northeast's Complaint and AT&T Corp.'s Answer, AT&T Corp. understood that the only issues for Commission determination are (1) whether AT&T and Northeast had reached a previous settlement on the claims underlying this Complaint; and if not, (2) a quantification of what AT&T Corp. owes Complainant.

¹ AT&T Corp. Answer, filed April 2, 2008 at pp. 1-2 (AT&T Corp. had been reporting the traffic as interstate and paying Complainant's interstate rates).

WHEREFORE, AT&T Corp. respectfully requests the Commission to deny
Complainants Motion for Summary Disposition.

Respectfully submitted,

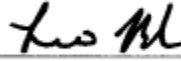
AT&T CORP.

BY 
TIMOTHY P. LEAHY #36197
LEO J. BUB #34326
ROBERT J. GRYZMALA #32454

Attorneys for AT&T Corp.
One AT&T Center, Room 3518
St. Louis, Missouri 63101
314-235-2508 (Telephone)/314-247-0014(Facsimile)
leo.bub@att.com

CERTIFICATE OF SERVICE

Copies of this document were served on the following parties by e-mail on May 27, 2008.



Leo J. Bub

General Counsel
Missouri Public Service Commission
PO Box 360
Jefferson City, MO 65102
general.counsel@psc.mo.gov

Public Counsel
Office of the Public Counsel
PO Box 7800
Jefferson City, MO 65102
opcservice@ded.mo.gov

Mr. Craig S. Johnson
1648-A East Elm Street
Jefferson City, MO 65101
craig@csjohnsonlaw.com