

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

In the Matter of the Investigation into Signaling)
Protocols, Call Records, Trunking Arrangements,)
and Traffic Measurement.)

Case No. TO-99-593

**SBC MISSOURI'S SUGGESTIONS IN OPPOSITION
TO MITG'S MOTION**

SBC Missouri,,¹ respectfully opposes the Motion for Prehearing Conference, Hearing, Tariff Declaration filed January 20, 2004 by the Missouri Independent Telephone Group².

This Motion is nothing more than another application for rehearing of the Missouri Public Service Commission's ("Commission's") December 13, 2001, Order in which the Commission directed Staff to begin the rulemaking process for an enhanced record exchange between telecommunications carriers.³ As the Commission is aware, MITG previously sought rehearing of the Commission's December 13, 2001 Order,⁴ which the Commission denied in Order Denying Rehearing on January 3, 2002. Then on November 21, 2002, MITG in a Motion to Adopt Business Relationship, again challenged the Commission's decision to initiate a rulemaking. The Commission denied this Motion as well and confirmed its intention that Staff continue drafting a proposed rule.⁵ As the Motion MITG has now filed makes clear, MITG simply refuses to accept any determination by the Commission that differs from its own demands. MITG's Motion should be denied out of hand.

As MITG is fully aware from its participation in the process, Staff has expended considerable effort in working with the industry to develop a proposed rule to implement an

¹ SBC Missouri Telephone, L.P., d/b/a SBC Missouri, will be referred to in this pleading as "SBC Missouri."

² The Missouri Independent Telephone Company Group will be referred to in this pleading as "MITG."

³ Order Directing Implementation, Denying Motion to Consolidate and Granting Intervention, Case No. TO-99-593, issued December 13, 2001.

⁴ MITG filed a Motion for Ruling on Unresolved Issue and/or Motion for Rehearing on December 20, 2001; STCG filed an Application for Rehearing on December 21, 2001.

⁵ Order Denying Motion, Case No. TO-99-593, released January 28, 2003, p. 1, 3.

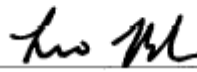
enhanced record exchange. While not complete, the draft rule is nearing completion. While it can be expected that industry participants (including SBC Missouri) may have issues with portions of any rule proposed by Staff, any disagreement with the substance of Staff's draft rule should be raised within the process that Staff has established to develop the proposed rule, and in any subsequent rulemaking proceeding before the Commission.

MITG's criticism of the length of time Staff has devoted to this effort is unfair. The subject matter addressed by the draft rule is complicated and cuts across many technical aspects of the provision of telecommunications service, record creation and billing. Through many conference calls, individual meetings and industry conferences, Staff has attempted to digest and investigate the many opinions expressed and concerns raised by various groups in the industry and to address them in its proposed rule. The numerous drafts put out by Staff to the industry reflect this work. The Commission should not allow MITG to derail Staff's efforts simply because they apparently disagree with the approach of Staff's draft rule.

WHEREFORE, for all the foregoing reasons, the Commission should deny MITG's Motion.

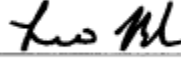
Respectfully submitted,

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CERTIFICATE OF SERVICE

Copies of this document were served on the following parties by e-mail on January 30, 2004.



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