



Rebecca B. DeCook
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September 4, 2003

Dale Hardy Roberts
Secretary of the Commission
Missouri Public Service Commission
PO Box 360
Jefferson City, MO 65101

FILED³

SEP 04 2003

Missouri Public
Service Commission

Re: Docket No. JI-2004-0176

Dear Mr. Secretary:

Attached for filing with the Commission, please find an original and eight (8) copies of AT&T Communications of the Southwest's Motion to Reject or Suspend for the above referenced tariff filing. AT&T Communications of the Southwest attempted to file this motion on September 3, 2003 but encountered problems with EFIS.

I thank you in advance for your cooperation in bringing this to the attention of the Commission.

Very truly yours,

A handwritten signature in cursive script that reads "Rebecca DeCook".

Rebecca B. DeCook

Attachment
cc: All Parties of Record

FILED³

BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI

SEP 04 2003

Missouri Public
Service Commission

In the Matter of the Application of Southwestern Bell)
Telephone Co. d/b/a SBC Filing Tariff Revisions to)
Suspend Billing and Collection Services for a Customer)
if the Customer is in Breach of Any Other Agreement)
Between the Parties

Docket No. JI-2004-0176

AT&T COMMUNICATIONS OF THE SOUTHWEST, INC'S
MOTION TO REJECT OR SUSPEND

COMES NOW AT&T Communications of the Southwest, Inc. ("AT&T")
pursuant to section 386.420, Section 392.200, and 392.230 R.S.Mo. and 4 CSR 240-
2.075, and respectfully submits its Motion to Reject or Suspend. In support of its request,
AT&T states as follows:

1. AT&T is a competitive local and interexchange telecommunications
company duly incorporated and existing under and by virtue of the laws of the State of
Delaware, authorized to do business in the State of Missouri as a foreign corporation.
AT&T's principal Missouri offices are located at 101 W. McCarty, Ste. 216, Jefferson
City, MO 65101. AT&T has been granted authority to provide local exchange service
and basic local exchange service in portions of Missouri as well as intrastate
interexchange telecommunications services in Missouri under authority granted and
tariffs approved by the Commission, as well as an authorized provider of interstate
interexchange telecommunications services under a certificate granted and tariffs
approved by the Federal Communications Commission.

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

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Jefferson City, MO 65101
Tel: 573-635-5198
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3. Southwestern Bell Telephone, L. P. d/b/a SBC Missouri, Inc. is a corporation organized and existing under the laws of the State of Texas and is a public utility subject to the jurisdiction of the Commission that provides certain telecommunications services in its service area within the State of Missouri under authority granted and tariffs approved by the Commission. It has offices at One Bell Center, St. Louis, Missouri 63101.

4. On or about August 13, 2003, SBC Missouri issued a tariff to revise its intrastate access tariff provisions relating to when SBC Missouri may suspend billing and collection services provided for its wholesale customers such as interexchange carriers (IXC). A copy of the proposed tariff is attached per 4 CSR 240-2.065(3). The revisions proposed by SBC would allow SBC to suspend billing and collection services, to withhold funds or future funds due to the billing and collection customer if SBC Missouri believes the billing and collection customer or any of its affiliates have breached any agreement with SBC Missouri. Pursuant to the proposed revisions, SBC would have the unilateral ability to withhold monies to offset any potential obligation of an IXC or its affiliated companies that may be due SBC and withhold the money even if the IXC or its affiliated companies has valid grounds to dispute the charges.

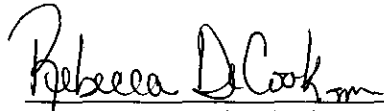
AT&T believes that allowing SBC Missouri to have this unilateral ability is unreasonable and contrary to the public interest. AT&T would also note that there is no dispute resolution process as part of this tariff or are there any provision for the return of amounts withheld by SBC Missouri. There is also a question as to whether the tariff revisions would allow SBC to withhold such monies even where the IXC and SBC have entered into a separate agreement for billing and collection services that provides a mechanism to dispute claims.

5. AT&T is a purchaser of SBC Missouri's access services including the billing and collection service that is the subject of the revised tariff. AT&T is also a competitor of SBC Missouri in the local exchange market as well as a competitor of SBC Missouri's affiliates in other markets. As a wholesale customer and competitor, AT&T has an interest in this proceeding that is different from that of the general public. AT&T may be adversely affected by the tariff proposed by SBC Missouri, Inc. Therefore, a decision on this matter will affect its interest as a provider of telecommunications services in Missouri. At this time, AT&T is opposed to the proposed tariff but is unsure of the position it will take on specific issues that might arise in this proceeding.

6. AT&T suggests that the Commission reject the proposed tariff or, in the alternative, suspend the tariff under Section 392.230, set an intervention period and establish a prehearing conference so that all parties can develop a proposed procedural schedule.

WHEREFORE, AT&T respectfully requests the Commission to grant this Motion to Reject or Suspend.

Respectfully submitted,

A handwritten signature in cursive script, reading "Rebecca DeCook".

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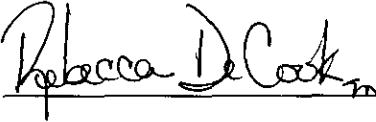
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ATTORNEYS FOR AT&T
COMMUNICATIONS OF THE
SOUTHWEST, INC.

CERTIFICATE OF SERVICE

(JI-2004-0176)

I certify that copies of AT&T's Motion to Reject or Suspend were served on the following by e-mail on September 3, 2003.



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