

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

In the Matter of a Request for Expansion of)	
the St. Louis Metropolitan Calling Area Plan to)	
Include the Exchanges of Washington, Union,)	Case No. TO-2005-0141
Wright City, St. Clair, Marthasville, Beaufort,)	
Foley, and Warrenton.)	

**SOUTHWESTERN BELL TELEPHONE, L.P., D/B/A SBC MISSOURI'S
REPLY TO OFFICE OF PUBLIC COUNSEL'S RESPONSE TO SBC MISSOURI'S
MOTION TO DISMISS OFFICE OF THE PUBLIC COUNSEL'S REQUEST FOR
EXPANSION OF THE ST. LOUIS METROPOLITAN CALLING AREA PLAN**

Comes now Southwestern Bell Telephone, L.P., d/b/a SBC Missouri ("SBC Missouri") and, for its Reply to Office of Public Counsel's ("OPC") Response to SBC Missouri's Motion to Dismiss OPC's Request for Expansion of the St. Louis Metropolitan Calling Area Plan ("Request"), states as follows:

1. SBC Missouri reiterates that the Missouri Public Service Commission ("Commission") should dismiss OPC's Request. As OPC candidly admits, there are already three cases that are currently pending to address this issue.¹ Moreover, OPC offers no justification for having the same request for relief pending in three cases. It is, quite simply, not appropriate for the same issue to be considered in multiple, concurrent proceedings.

2. Additionally, while OPC states that its Request in this case is based on its view of the Task Force's report and recommended process², to date, the Commission has not considered the Task Force Recommendations, including the recommendation that previously filed petitions for proposed modifications to the MCA be taken up and considered as filed petitions under the process proposed by the Task Force. Thus, the Commission should first consider the Task Force Recommendations before considering OPC's Request.

¹ See OPC's Response to SBC Missouri's Motion to Dismiss Request for Expansion of the St. Louis MCA, page 1, paragraph 1.

² Id. at page 1, paragraph 2.

Wherefore, SBC Missouri prays that the Missouri Public Service Commission grants its Motion to Dismiss Request for Expansion of the St. Louis Metropolitan Calling Area Plan, together with any additional relief that the Commission deems just and proper.

Respectfully submitted,

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CERTIFICATE OF SERVICE

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