

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

In the Matter of Neutral Tandem-Missouri,)
LLC's Filing to Introduce Its Access) Case No. TT-2010-0099
Services Tariff P.S.C. Mo.-No. 3.)

**AT&T RESPONSE TO
NEUTRAL TANDEM'S THIRD STATUS REPORT**

AT&T Communications and AT&T Missouri (collectively, the "AT&T Companies"),¹ respectfully wish to inform the Missouri Public Service Commission ("Commission") that Neutral Tandem-Missouri, LLC ("Neutral Tandem") has added language to its tariff that sufficiently addresses the AT&T Companies' concern about Neutral Tandem's intent to follow the Ordering and Billing Forum's ("OBF's") Multiple Exchange Carrier Access Billing ("MECAB") Guidelines. Neutral Tandem's adherence to these guidelines should help ensure that industry standard billing records are created and exchanged between carriers.

AT&T Communications, however, as an interexchange carrier ("IXC") customer of Neutral Tandem's switched access services, still has concerns with Neutral Tandem's proposed tariff and believes Commission investigation is needed.

With its proposed tariff filing, Neutral Tandem seeks to insert alternative access tandem switches into the telecommunications network in Missouri. As an IXC, AT&T Communications welcomes additional alternatives and the potential for increasing the level of competition in the telecommunications field. In principle, competition should result in better services and reduced costs for carriers, to the ultimate benefit of end users. But Neutral Tandem's proposal appears to

¹ AT&T Communications of the Southwest, Inc. will be referred to in this pleading as "AT&T Communications;" and Southwestern Bell Telephone Company, d/b/a AT&T Missouri, will be referred to in this pleading as "AT&T Missouri."

result only in the imposition of additional costs to IXCs without any added functionality or benefit. Currently, IXCs have built out facilities to the tandem switches of the various incumbent local exchange carriers (“ILECs”) in the state (e.g., AT&T Missouri, CenturyLink, Chariton Valley, Fidelity, Green Hills, Windstream) to access those carriers’ end user customers and the end user customers of the local carriers that subtend those tandem switches (e.g., smaller ILECs and CLECs).

When Neutral Tandem recruits CLECs or other local carriers to home their local end office switches off Neutral Tandem’s new tandem switch (in lieu of the ILEC tandem switch), Neutral Tandem will provide a tandem switching function and will collect the tandem switching and transport charges set out in its proposed tariff. Although those rates are to mirror those of the ILEC, IXCs’ costs to access those local customers will increase substantially because they will be forced to purchase duplicative functions. IXCs, who are truly captive customers of the carrier providing access service, will only be able to access those local customers through Neutral Tandem. If an IXC wishes to ensure its calls are completed to and from those customers, it will have only two choices: (1) build out duplicative additional facilities to the Neutral Tandem switch; or (2) pay duplicative tandem switching charges (i.e., one to the ILEC for switching the call to Neutral Tandem, and another to Neutral Tandem for switching the call on to the subtending local carrier). In either case, IXCs will incur a substantial increase in cost. But they will receive no added value. Increasing the cost of service in this manner will only put upward pressure on consumer rates.

AT&T Communications continues to believe that Neutral Tandem’s proposed tariff raises important telecommunications policy questions that need to be addressed before the tariff is permitted to go into effect.

WHEREFORE AT&T Communications respectfully requests the Commission to suspend Neutral Tandem's proposed tariff filing for investigation.

Respectfully submitted,

AT&T COMMUNICATIONS OF THE SOUTHWEST
INC., and
SOUTHWESTERN BELL TELEPHONE COMPANY,
D/B/A AT&T MISSOURI

BY  _____

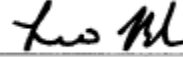
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CERTIFICATE OF SERVICE

Copies of this document were served on the following parties by e-mail on December 7, 2009.



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