

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

In the Matter of a Further Investigation of )	
the Metropolitan Calling Area Service )	
after the Passage and Implementation of )	Case No. TO-2001-391
the Telecommunications Act of 1996. )	

**POSITION STATEMENT OF  
SPECTRA COMMUNICATIONS GROUP, LLC dba CENTURYTEL  
AND CENTURYTEL OF MISSOURI, LLC**

**COMES NOW** Spectra Communications Group, LLC d/b/a CenturyTel (“Spectra”) and CenturyTel of Missouri, LLC (“CenturyTel of Missouri”) (collectively referred to herein as “CenturyTel”) and submits the following Position Statement regarding the Proposed List of Issues submitted by the parties in this case on May 6, 2003:

1. On April 7, 2003, Regulatory Law Judge Vickie Ruth issued an Order Directing Filing in which the parties were directed to file a List of Issues that are ripe for decision in this proceeding. The parties were also directed to file position statements addressing their respective positions regarding the List of Issues.

2. On May 6, 2003, the parties submitted and identified the following list of issues, although not all agree every identified issue is ripe for decision by the Commission in this case. CenturyTel will indicate its position on these issues in the same order submitted to the Commission.

## POSITION OF CENTURYTEL ON LIST OF ISSUES

1. Based on the instant record, is it necessary or appropriate to modify or alter the existing MCA plan?

**CENTURYTEL POSITION:** No. As discussed in the on-the-record presentation held in this matter on July 15, 2002, CenturyTel believes that it is not necessary or appropriate to modify or alter the existing MCA plan.

2. If so, what specific modifications or alterations are necessary or appropriate given the record in this case?
  - a. Does the Commission have the authority to modify the MCA Plan?

**CENTURYTEL POSITION:** CenturyTel believes that the Commission has the authority to review and modify the existing MCA Plan. However, any changes made to the existing MCA Plan must be implemented consistent with the Commission's existing statutory authority. In particular, CenturyTel strongly believes that the Commission is required to maintain revenue neutrality for CenturyTel in the event that any changes are ordered for the existing MCA Plan.

1. If the Commission has the authority to modify the MCA Plan, is it necessary or appropriate to do so?

**CENTURYTEL POSITION:** As stated above, CenturyTel does not believe that it is necessary or appropriate to modify the existing MCA Plan. In addition, there is no competent and substantial evidence in context of this proceeding (Case No. TO-2001-391) to support changes to the MCA Plan at this time.

2. If the Commission has the authority to modify the MCA Plan and it is necessary and appropriate to do so, should the Commission order implementation of MCA-2?

**CENTURYTEL POSITION:** As stated above, CenturyTel does not believe that it is necessary or appropriate to modify the existing MCA Plan. As a result, CenturyTel does not believe it is necessary and appropriate to order the implementation of MCA-2 at this time.

3. If the Commission orders implementation of MCA-2, what carriers would be subject to the Commission's order?

**CENTURYTEL POSITION:** There is no competent and substantial evidence in the record of this case to support the implementation of MCA-2 at this time.

- b. If the Commission orders implementation of MCA-2, what are the appropriate rates?

**CENTURYTEL POSITION:** CenturyTel believes that there is no competent and substantial evidence in the record to determine the appropriate rates for MCA-2 in the event that the Commission believes it would be in the public interest to implement MCA-2 in the future. Additional investigation and meetings of the parties would be required to develop "just and reasonable" rates for an MCA Plan that included MCA-2 service.

- c. Is revenue neutrality required or appropriate for all carriers (i.e. price cap carriers, rate of return regulated carriers, competitive carriers, etc.) if the Commission implements revenue impacting changes to the MCA, such as MCA-2?

**CENTURYTEL POSITION:** CenturyTel strongly believes that the Commission is required to maintain revenue neutrality for price cap carriers such as CenturyTel and rate of return regulated carriers, if any changes are ordered for the existing MCA Plan. CenturyTel takes no position on whether revenue neutrality is required or appropriate for competitive carriers.

1. If revenue neutrality is required or appropriate, how should revenue neutrality be implemented?

**CENTURYTEL POSITION:** There is no competent and substantial evidence in the record of this proceeding to support any particular methodology for implementing revenue neutrality. The implementation process for achieving revenue neutrality should be determined after additional work by the parties of this proceeding.

2. Are implementation costs required or appropriately included as a part of revenue neutrality?

**CENTURYTEL POSITION:** Yes. CenturyTel's implementation costs are required and appropriately included as a part of any revenue neutrality calculation.

- d. Are there additional financial impacts to consider if the MCA is modified?

**CENTURYTEL POSITION:** Yes. However, there is no competent and

substantial evidence in the record to specifically identify such financial impacts.

- e. Should wireless carriers be allowed to fully participate in the MCA plan?

**CENTURYTEL POSITION:** No. As the original MCA Order has already found, the MCA Plan should not be expanded to include wireless carriers. (See Final Status Report of MCA Task Force, p. 18). CMRS already provide expanded calling scopes that are greater than the MCA calling scopes used by wireline carriers, and it is therefore unnecessary for wireless carriers to participate in the MCA Plan.

- 1. Is revenue neutrality required or appropriate for all carriers (i.e. pricecap carriers, rate of return carriers, competitive carriers, etc.) if wireless carriers are allowed to fully participate in the MCA plan?

**CENTURYTEL POSITION:** CenturyTel strongly believes that the Commission is required to maintain revenue neutrality for price cap carriers such as CenturyTel and rate of return regulated carriers if any changes are ordered for the existing MCA Plan, including the expansion of the MCA Plan to include wireless carriers.

- f. Should MCA be available to pay phones, resellers, and aggregators?

**CENTURYTEL POSITION:** No. As the original MCA Order has already found, the MCA Plan should not be expanded to include pay phones, resellers, and aggregators. (See Final Status Report of MCA Task Force, p. 19).

- 1. Is revenue neutrality required or appropriate for all carriers (i.e. price cap carriers, rate of return carriers, competitive carriers, etc.) if MCA service is made available to pay phones, resellers, and aggregators?

**CENTURYTEL POSITION:** CenturyTel strongly believes that the Commission is required to maintain revenue neutrality for price cap carriers such as CenturyTel and rate of return regulated carriers if any changes are ordered for the existing MCA Plan, including the expansion of the MCA Plan to include pay phones, resellers, and aggregators.

- g. Does the Commission have the authority to make tier 3 (or any optional tier) of the current MCA mandatory?

- 1. If so, should tier 3 of the current MCA be made mandatory?

**CENTURYTEL POSITION:** CenturyTel believes that the Commission has the authority to review and modify the existing MCA Plan. However, any changes made to the existing MCA Plan must be implemented consistent with the Commission's existing statutory authority. In particular, CenturyTel strongly believes that the Commission is required to maintain revenue neutrality for CenturyTel in the event that any changes are ordered for the existing MCA Plan. CenturyTel does not believe that there is competent and substantial evidence in this proceeding to support the expansion of the existing MCA Plan by making tier 3 mandatory.

- h. Should MCA subscribers in the optional MCA tiers be allowed to call all telephone numbers in the mandatory MCA areas, regardless of the type of service offered in the mandatory tier?

**CENTURYTEL POSITION:** No. CenturyTel does not believe that MCA subscribers in the optional MCA tiers should be allowed to call all telephone numbers in the mandatory MCA areas, regardless of the type of service offered in the mandatory tier. There is no competent and substantial evidence in the record to support an expansion of the MCA Plan at this time.

- i. Should the current MCA be expanded to include a tier 6 MCA area (or tier 3 in Springfield)?

**CENTURYTEL POSITION:** No. CenturyTel does not believe that the current MCA should be expanded to include a tier 6 MCA area (or tier 3 in Springfield). There is no competent and substantial evidence in the record to support an expansion of the MCA Plan at this time.

- 3. Is the LERG an appropriate mechanism to identify the MCA NXX codes in the future?
  - a. Should LERG "J" codes be used as the proper optional MCA NXX identifier?

- b. Should LERG “J” codes be used to designate NXX codes in the mandatory MCA areas?

**CENTURYTEL POSITION:** The parties represented on the Industry Task Force have not come to a consensus on this issue. (See Final Status Report, p. 14). CenturyTel believes that this issue requires more investigation before a final decision is made on this issue.

4. If the Commission does not change the way NXX codes are currently allocated for MCA service, what if any action should the Commission take regarding the NANPA’s denial of MCA NXX codes to local exchange carriers?

**CENTURYTEL POSITION:** CenturyTel believes that the Commission may address NANPA's denial of MCA NXX codes to local exchange carriers on a case-by-case basis, and it is unnecessary to address this issue in this proceeding.

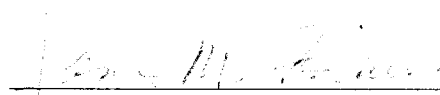
5. Should MCA traffic be carried on separate trunk groups?

**CENTURYTEL POSITION:** CenturyTel believes that establishing dedicated trunks for MCA traffic would be expensive and not cost-effective. CenturyTel therefore recommends that common trunks continue to be used for MCA traffic at this time.

6. At present, OPC has requests for public hearings pending in response to requests to expand or modify MCA for (A) Lee's Summit/Greenwood, (B) Wright City/Innsbrook, (C) Lexington, and (D) Ozark/Christian County. Should the Commission schedule public hearings for these areas to obtain current customer sentiment for MCA?

**CENTURYTEL POSITION: No. CenturyTel believes that it would be premature to hold public hearings at this time.**

Respectfully submitted,



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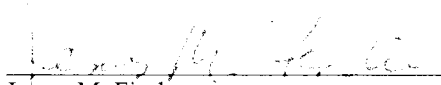
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