

BEFORE THE PUBLIC SERVICE COMMISSION

STATE OF MISSOURI

| | | |
|--|---|-----------------------|
| Northeast Missouri Rural Telephone Company |) | |
| |) | |
| Complainant, |) | |
| |) | |
| v. |) | Case No. IC-2008-0285 |
| |) | |
| AT&T Corp. |) | |
| |) | |
| Respondent. |) | |

Northeast Missouri Rural Telephone Company
Reply to AT&T's Answer and Affirmative Defenses to Complaint

Comes now Northeast Missouri Rural Telephone Company, (hereinafter "Northeast"), for its Reply to AT&T Corp.'s Answer and Affirmative Defenses to the Complaint of Northeast, and replies as follows:

1. Northeast denies all affirmative defenses set forth in the Answer of AT&T Corp.
2. AT&T's affirmative defense paragraph 3 is or should be barred by the doctrines of estoppel and / or unclean hands, in that AT&T knowingly failed to make, keep, retain, disclose or provide to Northeast or other local exchange carriers across the United States, actual records of enhanced prepaid calling card ("EPPC") traffic misreported as interstate traffic instead of intrastate traffic, thus making impossible accurate audit of such traffic. Further, Northeast and AT&T between 2005 and 2008 engaged in unsuccessful discussions aimed at resolving the dispute, with mutual agreement that the time taken to engage in such discussions would toll any applicable limitation period.

Respectfully Submitted;

_____/s/_____
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CERTIFICATE OF SERVICE

A copy of this document was served on the following parties by e-mail on this 8th day of April, 2008:

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_____/s/_____
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