

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

In the Matter of a Request for the Modification)
of the Springfield Metropolitan Calling Area Plan)
to Make the Ozark Exchange a Mandatory MCA)
Tier 1 Exchange.) Case No. TO-2005-0143

**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 TO
MODIFY THE SPRINGFIELD METROPOLITAN CALLING AREA PLAN
TO INCLUDE OZARK IN THE MANDATORY TIER 1 EXCHANGE**

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 Office of OPC's Request To Modify the Springfield Calling Area Plan to Include Ozark in the Mandatory Tier 1 Exchange ("OPC's 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 two cases that are currently pending to address this issue.¹ Moreover, OPC offers no justification for having the same request for relief pending in two 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 to Modify the Springfield Calling Area Plan to Include Ozark in the Mandatory Tier 1 Exchange, 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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