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December 30, 2003

The Honorable Dale Hardy Roberts
Secretary/Chief Regulatory Law Judge
Missouri Public Service Commission
200 Madison Street, Suite 100
Jefferson City, Missouri 65101

Re: Proposed Chapter 32 Amendments

Dear Judge Roberts:

This letter sets out SBC Missouri's¹ comments on the Proposed Amendments to Chapter 32 of the Commission's Rules as published in the December 1, 2003 edition of the Missouri Register (Volume 28, No. 23).

SBC Missouri concurs in the Comments filed by the Missouri Telecommunications Industry Association ("MTIA") on December 29, 2003 concerning amendments to the quality of service standards and reporting rules. The concerns voiced by MTIA apply to all carriers, both large and small (e.g., SBC Missouri is similarly dependent on third-party vendors for the delivery of specialized equipment or materials that cannot be kept in inventory and SBC Missouri also relies on contract labor to augment its work force). SBC Missouri would urge the Commission to adopt the changes recommended by MTIA.

In addition, SBC Missouri submits the following comments concerning proposed amendments to the service objectives and surveillance levels for operator assisted calls (Proposed Rule 4 CSR 240-32.0780(5)(C)). The proposed amendment to the current rule increases the speed of answer service objective for operator assisted calls from six to 12 seconds and the surveillance level from eight to 14 seconds. As the proposed rule explains, the purpose of these new objectives is to incorporate the required switch delay for 0- calls.

Under the existing rule, carriers calculate their performance by measuring the time from when the incoming call appears on an operator's switchboard to when the operator answers the call. SBC Missouri understands that under the proposed rule, it would be acceptable to calculate performance by combining a carrier's current measurement with its statewide switch delay time and reporting this aggregated measurement. While SBC Missouri

¹ Southwestern Bell Telephone, L.P., d/b/a SBC Missouri, will be referred to in this letter as "SBC Missouri."

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does not believe changes to the service objectives and surveillance levels are necessary or desirable, SBC Missouri does not strongly oppose the proposed amendment, provided that the method described in this paragraph to calculate performance is permitted to be used.

SBC Missouri, however, would oppose this amendment if the method described above for calculating performance under the new metrics for operator assisted calls is not permitted. No other method for calculating performance has been identified and SBC Missouri is unaware of whether an alternative method even exists. If another method for calculating performance under the proposed metrics for operator assisted calls is anticipated by the Commission, that method must be specifically identified so that carriers can determine its technical feasibility and estimate the cost of implementing it.

Please call me if you have any questions or need additional information concerning our comments.

Very truly yours,

A handwritten signature in black ink, appearing to read "Leo J. Bub", with a stylized, cursive script.

Leo J. Bub