

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

In the Matter of a Commission Inquiry into the	)	
Possibility of Impairment without Unbundled Local	)	Case No. TO-2004-0207
Circuit Switching When Serving the Mass Market.	)	

**CENTURYTEL'S STATEMENTS OF POSITIONS  
ON PHASE I LIST OF ISSUES**

**COMES NOW** Spectra Communications Group, LLC d/b/a CenturyTel and CenturyTel of Missouri, LLC (collectively referred to as "CenturyTel"), and in response to the Commission's December 1, 2003 Order Establishing Procedural Schedule, respectfully offer their Statements of Positions on the list of issues identified by the parties for Phase I of this proceeding:

1. For purposes of examining whether there is "non-impairment" in the provision of unbundled local switching to serve mass-market customers, what are the relevant geographic markets within the state of Missouri?

CenturyTel believes that Metropolitan Statistical Areas ("MSAs") are the relevant geographic markets within the state of Missouri for purposes of examining whether there is "non-impairment" in the provision of unbundled local switching to serve mass-market customers.

2. For purposes of the 47 CFR 51.319(d)(2)(iii)(B)(3) analysis, how many DS0 lines must be supplied to a multi-line DS0 customer before that customer is considered to be an enterprise customer rather than a mass market customer?

CenturyTel proposes to utilize the FCC's default rule for the DS0 crossover, which it has determined to be four lines or more in density zone one of the top 50 MSAs. Accordingly, those multi-line customers served by three DS0 loops or fewer would be

considered part of the mass market, while those multi-line customers served by four or more DS0 lines would be considered part of the enterprise market.

**WHEREFORE**, CenturyTel respectfully submits its Statements of Positions on the list of issues identified by the parties for Phase I of this proceeding.

Respectfully submitted,

/s/ Larry W. Dority

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### **Certificate of Service**

I hereby certify that copies of the foregoing have been mailed, hand-delivered, transmitted by facsimile or electronically mailed to all counsel of record this 20th day of January, 2004.

/s/ Larry W. Dority

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