



Tim Judge  
Area Manager - Regulatory

AT&T Services, Inc.  
101 W. High St.  
Jefferson City, MO 65101  
573-638-0261 Phone  
573-636-3522 Fax  
tj4848@att.com

December 10, 2010

Stephen C. Reed, Secretary  
Missouri Public Service Commission  
P. O. Box 360  
Jefferson City, Missouri 65102-0360

Dear Mr. Reed:

AT&T Missouri provides these additional comments to the proposed revisions to Chapter 319 RSMo in response to the Commission Staff's December 6, 2010 Roundtable request for input.

In summary, AT&T Missouri very much appreciates the diligent efforts Staff has expended in developing revisions intended to minimize damage to our facilities due to excavations. However, we share the concerns expressed by the Missouri Telecommunications Industry Association in its separate letter today. Additionally, AT&T Missouri continues to have a significant concern regarding the proposal to establish reporting requirements (Section 319.055). AT&T Missouri believes that these additional reporting requirements will not apply equally to all parties and will only add unnecessary costs to regulated utilities while not addressing a major cause of damage to its own facilities, i.e., excavators who do not call in for locates.

While we are unable to support this proposal, we do appreciate being provided the opportunity to review these proposed revisions and Staff's willingness to listen to and objectively evaluate all feedback.

Please refer any questions to me on 573-638-0261.

Very truly yours,

/s/ Tim Judge

Attachment