

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

In the Matter of the Request of)	
Southwestern Bell Telephone, L.P., d/b/a)	
SBC Missouri, for a Waiver of Certain)	Case No. TE-2006-0053
Requirements of 4 CSR 240-29.040(4).)	

**SPRINT'S RESPONSE TO ORDER
ADDING PARTIES AND DIRECTING FILING**

COMES NOW Sprint Missouri, Inc, ("Sprint") and hereby submits its Response to the Commission's Order Adding Parties and Directing Filing in the above referenced case dated September 12, 2005. The Commission's Order made Sprint a party to this case and directed Sprint to file a pleading explaining why Sprint is or is not affected by Commission Rule 4 CSR 240-29.040(4)(A). For its response, Sprint states the following:

1. Sprint is affected by the Commission Rule 4 CSR 240-29.040(4)(A). Sprint currently provides terminating carriers with either an (a) industry standard category 11 record, (b) a Missouri-specific category 11 record, or (c) a mutually agreed upon interexchange toll billing record, as contemplated under 4 CSR 240.29.040(4)(B). The determining factor in whether a carrier receives an (a) industry standard record, (b) a Missouri-specific record, or (c) mutually-agreeable record is based upon the type of call (such as wireless, wireline, CLEC, etc). Sprint acknowledges that a carrier receiving a billing record with a mutually-agreeable format as contemplated under 4 CSR 240.29.040(4)(B) may request to receive the record in an industry standard format. As such, Sprint outlined its fiscal impact associated with this potential change as part of the rulemaking process in Case No. TX-2003-0301.

2. Since the Commission's rule went into effect, no party currently receiving billing records from Sprint has requested any changes in toll record format. As such, Sprint is in full compliance with the Commission's rule. Acknowledging ~~the fact~~ that carriers receiving billing records based upon mutually-agreeable formats rather than industry-defined formats may change when a carrier makes a request to receive the industry-standard records, Sprint has initiated development steps to make the necessary system modifications. Sprint does not have an anticipated completion date for this effort at this time, primarily due to the fact that there are no carriers currently requesting a change.

3. Sprint notes that if a carrier makes a request to replace the current, mutually-agreeable format with an industry-defined format, once such system modifications are implemented by Sprint then all carriers previously using the mutually-agreeable format will be impacted by such a change. Sprint cannot support multiple versions of separate record creation processes based upon the individual needs of various carriers. For example, there are four parties currently receiving a mutually-agreeable formatted record for wireless originated calls that transit Sprint originating tandems in Missouri today. If just one of the four carriers requests a change to the industry-defined format, per the provisions of 4 CSR 240-29.040(4), Sprint will make the required change but that change will apply for all four carriers. While Sprint will provide all carriers with ample notice, such action will require the other three carriers to also make system and process modifications in order to accept the new record. Sprint anticipates that some of these system modifications being forced on the other carriers could be at some resulting level of cost.

WHEREFORE Sprint respectfully responds to the Commission's Order Adding Parties and Directing Filing.

Respectfully submitted,

SPRINT

A handwritten signature in black ink, appearing to read "Brett D. Leopold", written over a horizontal line.

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that on this 22nd day of November, 2005, a copy of the above and foregoing was served via electronic mail to each of the following parties:

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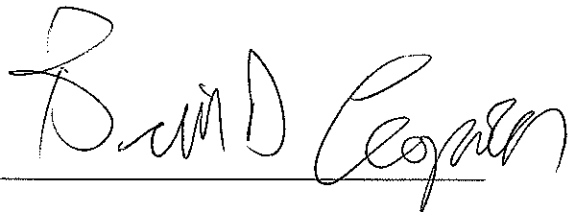
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