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Secretary of the Commission  
Missouri Public Service Commission  
P. O. Box 360  
Jefferson City, Missouri 65102-0360

Dear Secretary of the Commission:

AT&T provides the attached edits to the Commission Staff's latest proposed revisions to Chapter 319 RSMo.

In summary, AT&T very much appreciates the diligent efforts Staff has expended in developing revisions intended to minimize damage to our facilities due to excavations. However, AT&T believes that the current proposals to establish reporting requirements and performance measurement requirements will only add unnecessary costs to utilities while not addressing the major cause of facility damages.

Last October, in response to Staff's Underground Facility Damage Assessment Survey, AT&T provided three years of data demonstrating that excavators who do not call in for locates are the greatest cause of facility damages. This latest draft does nothing to address this issue.

We appreciate the opportunity of reviewing these revisions and look forward to working further with Staff in this endeavor.

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

Very truly yours,

/s/ Tim Judge

Attachment