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January 25, 2001

Mr. Leo Bub
Southwestern Bell Telephone Company
One Bell Center, Room 3520
St. Louis, MO 63101

Re: Case No. TO-99-593 (Network Case)

Dear Leo:

Enclosed please find the STCG's responses to SWBT's first and second sets of Data Requests No. 4, 5, 6, 10 and 11.

If you have any questions regarding the attached, please give me a call. Thank you for your patience in allowing us additional time to respond.

Sincerely,



W.R. England, III

WRE/da
Enclosure

Exhibit No. 34
Date 1-25-01 Case No. TO-99-593
Reporter TLL

Additional Response to
Southwestern Bell Telephone Company's
First Set of Data Requests

Request: - DR #4 – Does your company or one of its affiliates originate any of the following types of traffic for termination to SWBT over the Feature Group C common trunk using your facilities?

Response:

See Attached Schedule

Request: - DR #5 – If your answer to DR4 is affirmative, what type of records or information is being sent to SWBT for each of these types of traffic?

Response:

ALLTEL reports the following:

Local – None

Optional Calling Plans – 92-99

Toll – 92-99

Operator – 92-99

800 – no records when customer originates call

Wireless – none (This is traffic terminated by their affiliate through interconnection agreements with SWBT).

In regard to the rest of the companies, the following comments are generally applicable:

MCA Traffic – No records are passed

Optional Calling Plans – Due to a change in management immediately after Green Hills OCP plan was established, no records have been passed. Green Hills has recently been made aware of this issue and is working on developing the passing of 92 records on a going forward basis and making a retroactive settlement to SWBT based on actual customer billing records.

New London reports that no records are being passed at this time.

Operator Traffic – for these companies, the operator traffic that would be generated would be 0- traffic handled by SWBT operators. SWBT records these calls and has the capability of creating records. The companies are unaware of records being created at the present time. Call volumes of this type are very small.

SWBT Maximizer 800 traffic is originated from a number of companies. While it is believed that terminating access is being billed on this originating traffic pursuant to the intrastate tariff and based on originating records recorded after data queries have been made to identify the carrier, no records are being passed because creation of these records under the PTC plan was the responsibility of the terminating 800 carrier.

Request – DR #6 – If your answer is to DR 4 is affirmative, what type of compensation is taking place for each of these types of traffic?

Response:

ALLTEL's response is as follows:

- Local – Bill and Keep
- Optional Calling Plans – IntraLATA access
- Toll – IntraLATA access
- Operator – IntraLATA access
- Wireless – Reciprocal compensation
- FGA – Revenue Sharing

Responses for the remainder of the company's are generally as follows:

- MCA Traffic – Bill and Keep pursuant to MPSC order
- Optional Calling Plans – These are anticipated to be based on intraLATA access rates.
- Operator – IntraLATA access would be the appropriate compensation

Additional Response to
Southwestern Bell Telephone Company's
Second Set of Data Requests

Request: DR #10 – For each STCG Company, please provide all documentation supporting all efforts by the company to initiate negotiations with telecommunication companies that are sending traffic to each STCG Company over indirect connections.

Response:

STCG has had a number of contacts with various wireless carriers, particularly with Sprint PCS and SWB Wireless. Some negotiations were held with Sprint PCS, but those discussions broke down over the issue of the responsibility for IXC originated traffic to wireless carriers within the MTA. Documentation regarding these contacts are available in the testimony and exhibits of various witnesses in the Mark Twain et al. wireless tariff case, Case No. TT-2001-139 et al.; the Alma Tariff case, Case No. TT-99-428, et al.; and the SWBT wireless tariff case, Case No. TT-97-524.

Mr. England and Mr. Schoonmaker had a telephone contact with a CLEC well before the PTC plan was terminated discussing the requirements for exchanging records at that time. The CLEC was informed that the PTCs were currently responsible for paying any terminating compensation to the SC companies pursuant to the PTC plan. Since termination of the PTC plan, no contacts have been made with CLECs because of uncertainty which, if any CLECs were terminating traffic using the FGC network. Based on responses to the letter sent to CLECs documented in Appendices 2 and 3 of the Final Report of the Missouri Record Exchange Test, it appears that the CLECs responding to that letter did not originate FGC traffic.

Request: DR #11 – For each STCG Company please state what measures have been taken to insure that the terminating recording of traffic is accurate and no software or other problems exist? Please list all audit or maintenance activity designed to ensure that terminating records are accurate.

Response:

A number of activities have taken place to validate the terminating recording that has been and is continuing to be done. For tandem companies who routinely utilize terminating recordings made at their switches, validation has been made of switch instructions, test calls have been made to the switch to validate recording is taking place and comparisons are made between monthly volumes to monitor for unusual changes. For end office companies similar validations and test calls have also been made, both to

individual switches and between two ICO switches to compare recordings from either end. A number of companies have been recording terminating traffic and comparing it to overall volumes provided by the current originating records similar to the analysis presented by Mr. Schoonmaker in his exhibits for Kingdom and Citizens Telephone Companies. Citizens Telephone Company conducted a one-hour test with SWBT that was a precursor to the more complete network test undertaken this year. Ten companies participated in the Records Exchange Test documented in the Final Report presented in this case. On an individual company basis, contacts have been made with SWBT and Sprint to address specific issues regarding recording of certain types of traffic.

Response to SWBT DR #4

Types of traffic terminated to SWBT on FGC network

	Local	EAS	OCP	Toll	Operator	800	Wireless	FGA
ALLTEL	MCA		X	X	X	X	X	
BPS						X		
Cass County	MCA							
Citizens						X		
Craw-Kan					X	X		
Ellington						X		
Farber								
Grand River					X			
Goodman								
Granby					X	X		
Green Hills			X					
Holway					X			
Iamo					X			
Kingdom								
KLM					X			
Lathrop	MCA				X			
Le-Ru								
Mark Twain						X		
McDonald County					X			
Miller								
New Florence								
New London			X			X		
Orchard Farm	MCA					X		
Oregon Farmers								
Peace Valley								
Ozark								
Rock Port					X			
Seneca								
Steelville					X			
Stoutland						X		