

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

In the Matter of Southwestern Bell Telephone, )  
L.P. d/b/a AT&T Missouri's Revision to its ) Case No. \_\_\_\_\_  
General Exchange Tariff, PSC Mo.-No. 35 ) Tariff No. JI-2007-0678  
Regarding Provision of 511 Service. )  
)

**AT&T MISSOURI'S MOTION FOR EXPEDITED TREATMENT**

COMES NOW AT&T Missouri,<sup>1</sup> and respectfully submits this motion for expedited treatment, pursuant to Commission Rules 2.065(2) and 2.080(16) (4 CSR 240-2.065(2) and 4 CSR 240-2.080(16)). By this motion, AT&T Missouri requests that the Commission expeditiously approve AT&T Missouri's proposed "511" tariff filed contemporaneously herewith. In support thereof, AT&T Missouri states as follows:

1. Major reconstruction of Interstate Highway 64 (I-64) in the St. Louis area will start soon. The scope of this reconstruction -- and in particular, its affect on road users -- is anticipated to be significant. According to one recent news account:

With the Missouri Department of Transportation's (MoDOT) reconstruction of I-64/40 shifting into high gear, officials from the St. Louis County Department of Highways and Traffic are cautioning road users throughout the region to prepare for three years of significant adjustment to their normal routines. For the next 36 months, partial closures of the interstate will divert tens of thousands of motorists every day onto alternate routes through the heart of St. Louis County.<sup>2</sup>

2. MoDOT has expressed significant concrete interest in ensuring that callers can secure important and timely information in connection with this multi-year reconstruction work. .

3. In July, 2000, the FCC issued its "511 Order," in which it granted the United States Department of Transportation's "petition for assignment of a nationwide N11 code for use by state and

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<sup>1</sup> Southwestern Bell Telephone, L.P. d/b/a AT&T Missouri ("AT&T Missouri").

<sup>2</sup> Saint Louis County Direct, March 2007, p. 2 (accessible at [www.stlouisco.com](http://www.stlouisco.com)).

local governments to deliver travel-related information to the public.”<sup>3</sup> Consequently, the FCC ordered that “511 is assigned as a national abbreviated dialing code to be used exclusively for access to travel information services.”<sup>4</sup> Consistent with the FCC’s 511 Order, AT&T Missouri’s proposed 511 tariff filed contemporaneously herewith would allow individuals to access, by means of dialing 5-1-1, a governmental agency provider of travel information services.

4. In connection with the reconstruction of I-64, MoDOT has advised AT&T Missouri that it is preparing to deploy a travel information service for callers in Franklin, Jefferson, St. Charles and St. Louis counties, as well as the City of St. Louis, and has asked that AT&T Missouri provision 511 so that callers can access this service. AT&T Missouri’s proposed 511 tariff is intended to meet MoDOT’s needs as expressed to AT&T Missouri, consistent with the FCC’s 511 Order.

5. Commission Rule 3.545 (4 CSR 240-3.545(12)) generally provides that new service tariffs may become effective within thirty days after filing same with the Commission. However, pursuant to Commission Rules 2.065(2) and 2.080(16) (4 CSR 240-2.065(2); 4 CSR 240-2.080(16)), AT&T Missouri respectfully seeks expedited treatment of its proposed tariff so that the tariff may be allowed to take effect within ten (10) business days hereof.

6. Should the Commission grant expedited treatment as requested above, MoDOT and callers to MoDOT’s travel information service will thus receive earlier the benefits intended to be afforded by AT&T Missouri’s 511 tariff, as expedited tariff approval will permit expedited network implementation and all details associated therewith (including testing). Conversely, AT&T Missouri does not envision any negative consequence to either MoDOT or members of the general public should

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<sup>3</sup> In the Matter of Petition by the Inted States Department of Transportation for Assignment of an Abbreviated Dialing Code (N11) to Access Intelligent Transportation System (ITS) Services Nationwide, et al., Third Report and Order and Order on Reconsideration, 15 FCC Rcd 16753 (2000) (“511Order”).

<sup>4</sup> 511 Order, para. 51

the Commission grant AT&T Missouri the expedited treatment it seeks. Finally, AT&T Missouri developed and finalized its proposed 511 tariff and prepared this request for expedited treatment as soon as it could following MoDOT's firm expression of interest in deploying travel information service aided by 511 dialing capability.

WHEREFORE, AT&T Missouri respectfully requests that the Commission grant this Motion for Expedited Treatment and issue an order allowing AT&T Missouri's 511 tariff to take effect within ten (10) business days from today.

Respectfully submitted,

SOUTHWESTERN BELL TELEPHONE, L.P.  
D/B/A AT&T MISSOURI

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## **CERTIFICATE OF SERVICE**

Copies of this document were served on the following parties by e-mail on March 27, 2007.

  
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