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May 16, 2003

Dale Hardy Roberts
Secretary of the Commission
Missouri Public Service Commission
PO Box 360
Jefferson City, MO 65101

FILED³
MAY 16 2003
**Missouri Public
Service Commission**

Re: Case No. TO-2001-438

Dear Mr. Secretary:

Attached for filing with the Commission, please find the original and eight (8) copies of AT&T Communications of the Southwest's Joint Sponsor's Comments on SBC Missouri's Revised Compliance Rates.

I thank you in advance for your cooperation in bringing this to the attention of the Commission.

Very truly yours,

Kevin K. Zarling
Kevin K. Zarling

Attachment
cc: All Parties of Record

FILED³

MAY 16 2003

BEFORE THE MISSOURI PUBLIC SERVICE COMMISS

In the Matter of the Determination of Prices,)
Terms, and Conditions of Certain Unbundled)
Network Elements.)

Missouri Public
Service Commission
Case No. TO-2001-438

JOINT SPONSORS' COMMENTS
ON SBC MISSOURI'S REVISED COMPLIANCE RATES

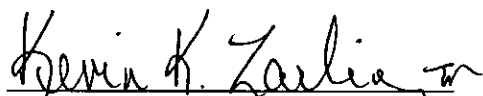
Come Now AT&T Communications of the Southwest, Inc, MCImetro Access Transmission Services, LLC, Brooks Fiber Communications of Missouri, Inc., MCI WorldCom Communications, Inc., Birch Telecom of Missouri, Inc., XO Missouri, Inc., NuVox Communications of Missouri, Inc., McLeodUSA Telecommunications, Inc., TCG Kansas City, Inc., and TCG St. Louis, Inc. (collectively "Joint Sponsors"),¹ and respectfully submit their comments on SBC Missouri's revised compliance rates filed April 25, 2003.

1. The Joint Sponsors' have reviewed SBC Missouri's revised compliance rates. A number of the final rates are the product of negotiation and compromise regarding the appropriate development of costs study inputs and/or the appropriate implementation of the Commission's decision on inputs. In that regard, the Joint Sponsors reserve the right to argue in any subsequent proceeding, in Missouri or in any other jurisdiction, that the inputs and rates resulting from such compromises or settlements are inappropriate and not compliant with the FCC's TELRIC rules. With the exception of two rates discussed below, the Joint Sponsors do not object to any of SBC Missouri's revised compliance rates.

2. There are two rates for which the Joint Sponsors believe there may be some confusion whether the rates correctly reflect the parties' settlement of their original

dispute over proper implementation of the Commission's decision on Issue 158. The affected rates are the recurring installation rates for the 2-wire and 4-wire dedicated transport cross-connect elements. The Joint Sponsors discovered the perceived discrepancy late in their review of SBC Missouri's revised compliance filing, the perceived discrepancy has been informally communicated to SBC Missouri, and SBC Missouri has not had adequate time to further review its rate development for these two elements. It is the Joint Sponsor's expectation that there will be no dispute over Issue 158 once SBC Missouri has had additional time to fully consider the Joint Sponsor's informal comments on the rates for the two affected elements. Consequently, the Joint Sponsors reserve any further comments on SBC's compliance with the Commission's decision on Issue 158 and reserve the right to further object and argue regarding SBC Missouri's compliance with Issue 158. The undersigned counsel has been authorized to represent that SBC Missouri does not object to this reservation of rights.

Respectfully Submitted,

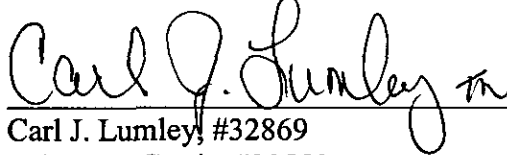


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¹ Undersigned counsel for AT&T has been authorized to represent the other Joint Sponsor parties'

CURTIS, OETTING, HEINZ,
GARRETT & O'KEEFE, P.C.

A handwritten signature in cursive script, reading "Carl J. Lumley". The signature is written in black ink and is positioned above a horizontal line.

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CERTIFICATE OF SERVICE BY MAIL

A true and correct copy of the foregoing in Docket TO-2001-438 was served upon the parties identified on the following service list on this 16th Day of May, 2003 by either hand delivery or via Airborne Express.

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