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October 14, 1997

FILED

OCT 14 1998

Mr. Dale Hardy Roberts
Secretary/Chief Regulatory Law Judge
Missouri Public Service Commission
301 West High Street, Suite 530
Jefferson City, MO 65101

Missouri Public
Service Commission

Re: An Investigation into the Provision of Community Optional Calling Service In
Missouri
Case No. TW-97-333

Dear Mr. Roberts:

Enclosed for filing is an original and fourteen copies of the Response of Sprint Missouri, Inc. to Motions for Clarification of Commission's Order. Please file stamp the extra copy for our records.

If you have any questions, please do not hesitate to contact me at (913) 345-7915.

Sincerely,

Linda K. Gardner

Linda K. Gardner

by Dennis Bergmeyer

LKG:ket
Enclosures
cc: All Parties

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

In the Matter of an Investigation into the)
Provision of Community Optional Calling))
Service in Missouri.)

Case No. TW-97-333

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Missouri Public
Service Commission

**Response of Sprint Missouri, Inc. to
Motions for Clarification of Commission's Order**

Comes now Sprint Missouri, Inc. (Sprint) and in response to the Motion of Clarification filed by the Office of the Public Counsel (OPC) states as follows: Both OPC and Mid-Missouri Group (which filed an earlier Motion for Clarification) seek clarification of the Commission's October 1, 1998 Order to the extent it may be interpreted to allow the elimination of COS prior to implementation of 1+ intraLATA presubscription in both the target and the petitioning exchanges. Sprint believes this is precisely what the Commission's orders allow.

Sprint has scheduled the elimination of COS from its exchanges on a timeline that balances the Commission's requirements, the interests of the company and the majority of the customer's desire for choice.

The Commission knows that Sprint is in the process of eliminating COS on these routes. On October 1, 1998 the Commission also issued an Order Approving Tariff in Case No. TT-91-81. That case approved a tariff filed by Sprint which was designed to limit COS to existing customers and to not offer it to new customers in the brief period between October 9, 1998 and November 9, 1998, when COS will be eliminated for all customers in those exchanges. On November 9, 1998, Sprint will eliminate COS in certain of its exchanges that involve seven GTE petitioning exchanges, six Southwestern Bell petitioning exchanges and five Sprint petitioning exchanges.

Obviously, to the extent that the routes involve SWBT exchanges, SWBT's customers will not have 1+ intraLATA presubscription at the time COS is eliminated with a Sprint exchange. Yet, the Commission clearly ruled that ". . . there is nothing in the Commission's order that would prohibit Sprint from voluntarily eliminating COS and implementing intraLATA presubscription in accordance with its already-approved implementation plan." (Order Approving Tariff, p. 3, TT-99-81)

While OPC seems to suggest that Sprint should be prohibited from proceeding with this planned elimination because SWBT's customers may be inconvenienced or confused, it would cause more inconvenience and confusion to halt the process. Sprint has already notified customers and has undertaken the necessary steps in its billing and other systems to eliminate COS on those routes on November 9, 1998. The process to implement 1+ intraLATA presubscription in Sprint's exchanges is likewise in place.

Sprint has carefully considered the appropriate timeframe for the remainder of its exchanges and COS routes. On February 26, 1999, Sprint plans to eliminate COS return calling for calls to COS customers in Conception Junction (Grand River Telephone Company), Stoutland and Eldridge (Stoutland Telephone Co.). The target exchanges, Maryville and Lebanon, are scheduled to implement ILP on November 9, 1998. While Sprint could propose to eliminate COS coincident with implementation of ILP in the target exchange, Sprint allowed the Secondary Carriers additional time to implement ILP, develop an alternative service, or to prepare its customers for the elimination of COS. Although Sprint is willing to continue COS for a

short period of time after 1+ intraLATA presubscription in these limited exchanges, it is not a sustainable option.

In addition, there are seven Sprint petitioning exchanges where Sprint will eliminate COS coincident with the conversion of the petitioning exchanges to 1+ intraLATA and interLATA equal access as described in the approved implementation plan and modernization plan. This will occur throughout 1999 and 2000.

The Commission has previously found that COS is a below-cost service subscribed to by a small number of customers. In Sprint's case, its larger exchanges were denied 1+ intraLATA presubscription until a decision was made about COS. In essence, the small number of customers subscribing to COS delayed 1+ intraLATA choice to a large number of customers. Continuing COS while also implementing 1+ intraLATA presubscription is not competitively neutral in the long run. While the October 1, 1998 Order eliminated the mandatory elimination date, that Order combined with the Order Approving Tariff in TT-99-81 clearly allow Sprint to proceed with 1+ intraLATA presubscription and to eliminate COS as proposed.

Respectfully Submitted,

SPRINT MISSOURI, INC.

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CERTIFICATE OF SERVICE

I HEREBY certify that a copy of the foregoing was served this 14th day of October, 1998 on all counsel of record by placing in US Mail, postage prepaid, or hand-delivery.
