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April 23, 1997

Mr. Cecil I. Wright
Executive Secretary
Missouri Public Service Commission
301 West High Street, Floor 5A
Jefferson City, Missouri 65101

Re: Case No. TW-97-333

Dear Mr. Wright:

Enclosed for filing with the Commission in the above-referenced case is an original and 14 copies of Reply of Southwestern Bell Telephone Company To Mid-Missouri Group's Response To Motion To Shorten Time.

Please stamp "Filed" on the extra copy and return the copy to me in the enclosed self-addressed, stamped envelope.

Thank you for bringing this matter to the attention of the Commission.

Very truly yours,

A handwritten signature in cursive script that reads "Paul G. Lane".

Paul G. Lane

Enclosures

cc: Attorneys of Record

FILED
APR 25 1997
MISSOURI
PUBLIC SERVICE COMMISSION

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

FILED
APR 25 1997
MISSOURI
PUBLIC SERVICE COMMISSION

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

Case No. TW-97-333

**REPLY OF SOUTHWESTERN BELL TELEPHONE COMPANY
TO MID-MISSOURI GROUP'S RESPONSE TO MOTION TO SHORTEN TIME**

Comes now Southwestern Bell Telephone Company (SWBT) and respectfully replies to the response of Mid-Missouri Group to SWBT's Motion to Shorten Time for Discovery Responses.

1. Mid-Missouri Group is opposed to shortening the time to respond to data requests on the basis that SWBT has unreasonably delayed in making the data requests. Mid-Missouri Group also asserts that the information requested is beyond the scope of the docket. Neither objection is meritorious.

2. The data requests filed by Southwestern Bell are designed to ferret out whether and which Independent Telephone Companies (ITCs) are engaged in a misuse of COS service in violation of SWBT's tariffs and the Commission's Order which adopted the present COS system. SWBT learned only recently of this potential fraudulent course of conduct and immediately submitted data requests to determine the scope of the misuse. The potential misuse includes (a) certain ITCs reselling and/or sharing COS service in violation of SWBT's tariff and (b) certain ITCs misreporting the number of lines which utilize COS services. The result of this conduct is that SWBT, as the PTC to certain ITCs suffers financial loss as a result of the misuse and under reporting of COS usage. Although as PTC SWBT is responsible for the provision of COS services, all customer contacts and billing are performed by the ITCs which are secondary

CERTIFICATE OF SERVICE

I served this document on the parties listed below by first-class U.S. Mail postage prepaid to all parties on April 24, 1997 with the exception of William England and Craig Johnson who were served by facsimile on that day.



Paul G. Lane

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