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October 22, 1999

Mr. Dale Hardy Roberts
Chief Administrative Law Judge
Missouri Public Service Commission
P. O. Box 360
Jefferson City, MO 65102

Re: Case No. TT-99-428

FILED²

OCT 22 1999

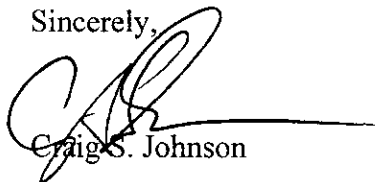
Missouri Public
Service Commission

Dear Judge Roberts:

Enclosed please find an original and 15 copies of the Mid-Missouri Group questions to AT&T being submitted pursuant to the post-hearing procedural schedule. A copy of this letter, and the enclosed questions to AT&T have this day been served upon all attorneys of record in the case.

Thank you for seeing this filed.

Sincerely,



Craig S. Johnson

CSJ:om

cc: OPC
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BEFORE THE PUBLIC SERVICE COMMISSION

STATE OF MISSOURI

FILED²

OCT 22 1999

Missouri Public
Service Commission

In the matter of the Mid-Missouri
Group companies filing to revise its
Access Service Tariffs.

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Case No. TT-99-428, et al.

Mid-Missouri Group Questions to AT&T Communications of the Southwest

Comes now the Mid-Missouri Group, pursuant to the post-hearing procedural schedule, and submits the following factual questions to AT&T Communications of the Southwest:

1. What affiliate(s) of AT&T are currently operating as an alternative or competitive local exchange telecommunications company (CLEC) in Missouri?
2. For each interconnection agreement (IA) that each such CLECs has with incumbent local exchange companies in Missouri, please state the following:
 - a. identify the ILEC and the AT&T affiliate that are parties to each such IA;
 - b. the date the IA was approved by the Commission;
 - c. whether the CLEC is operating as a reseller or facilities based CLEC;
 - d. whether there is a direct physical interconnection with the ILEC;
 - e. what entity requested the IA;
 - f. whether arbitration was required prior to completion of the IA;
 - g. what entity requested arbitration;
 - h. what local calling scope of the CLEC is defined by the IA;
 - i. all terms of the IA that pertain to CLEC traffic destined for third party carriers;

58

- j. for third party traffic, what entity records this traffic;
- k. for third party traffic, where the recordings are made;
- l. for third party traffic, what records are exchanged;
- m. the compensation rate for traffic terminated by the ILEC;
- n. the compensation rate for traffic transitted by the ILEC to third parties;
- o. whether the CLEC has maintained records of dates and volumes of third party traffic.

3. Has the CLEC originated "non-local" or "toll" traffic terminating to third party ILEC exchanges?

4. State the inclusive dates and amounts of all such traffic identified in your answer to #3 above.

5. Have you paid any terminating compensation to any third party ILECs for traffic identified in #3 above?

6. Has the IA ILEC you interconnect with paid any terminating compensation to any third party ILECs for traffic identified in #3 above?

7. Do you take the position that the third party ILECs have been compensated pursuant to terminating to originating ratios for the traffic identified in #3 above?

8. Has the CLEC originated "local" traffic terminating to third party ILEC exchanges?

9. State the inclusive dates and amounts of all such traffic identified in your answer to #8 above.

10. Have you paid any terminating compensation to any third party ILECs for traffic identified in #8 above?

11. Has the IA ILEC you interconnect with paid any terminating compensation to any third party ILECs for traffic identified in #8 above?

12. Do you take the position that the third party ILECs have been compensated pursuant to terminating to originating ratios for the traffic identified in #8 above?

13. Please identify any and all Missouri approved interconnection agreements or reciprocal compensation agreements you have entered into with ILECs with whom you indirectly interconnect with.

14. Have you ever received a request for interconnection from an ILEC?

15. Have you ever made a request for interconnection or reciprocal compensation with any MMG ILEC?

16. Do you allow your local subscribers their choice of presubscribed 1+ interLATA and intraLATA long distance carriers?

17. Please identify each interLATA long distance 1+ carrier your customers can select.

18. Please identify each intraLATA long distance 1+ carrier your customers can select.

19. For interLATA long distance calls your customers originate, please identify what carrier pays accompanying terminating compensation.

20. For intraLATA long distance calls your customers originate, please identify what carrier pays accompanying terminating compensation.

21. For interLATA long distance calls your customers originate, does the responsible toll carrier pay you originating access?
22. For intraLATA long distance calls your customers originated, does the responsible toll carrier pay you originating access?
23. If your answer to #21 or #22 is in the negative, please identify what compensation, if any, you receive, and whether the compensation is paid pursuant to tariff or contract.
24. For any intraLATA long distance calls your customers originate, do you create any originating records for this traffic?
25. Please provide a copy of any records identified in your answer to #24 above.
26. Please identify all other LECs to whom the records identified in your answer to #24 are passed.

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By: 

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ATTORNEYS FOR MMG

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and correct copy of the foregoing was mailed, U. S. Mail, postage pre-paid, this 22nd day of October, 1999, to all counsel of record.



Craig S. Johnson