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Mimi B. MacDonald  
Senior Counsel

Southwestern Bell



**NP**

NON-PROPRIETARY

May 1, 2002

VIA FACSIMILE AND BY U.S. MAIL

Mr. Carl J. Lumley  
Curtis, Oetting, Heinz, Garrett  
& Soule, P.C.  
130 S. Bemiston  
Suite 200  
St. Louis, MO 63105

In re: TCG St. Louis and TCG Kansas City's Highly Confidential Response to  
SWBT's Second Set of Data Requests  
Case No. TO-2002-227

Dear Carl:

As you know, Southwestern Bell Telephone, L.P., d/b/a Southwestern Bell Telephone Company ("SWBT") is in receipt of TCG St. Louis' and TCG Kansas City's Highly Confidential Response to SWBT's Second Set of Data Requests in which TCG (presumably TCG St. Louis and TCG Kansas City combined) reported that they had approximately \*\*\*\*\* voice-grade equivalent lines for retail business customers. In that Response, TCG also noted that this count is based upon provisioning data and may include customers and lines that have subsequently disconnected. Thus, TCG concludes that this figure may overstate TCG's actual current term plan access line count.

SWBT is also in receipt of Staff's Late Filed Exhibit No. 23. In that Exhibit, Staff states that TCG Kansas City reported \*\*\*\*\* voice-grade equivalent business access lines and TCG St. Louis reported \*\*\*\*\* voice-grade equivalent business access lines. In other words, according to Staff's Late Filed Exhibit No. 23, TCG collectively reported \*\*\*\*\* voice-grade equivalent business access lines.

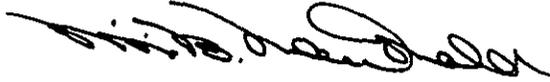
I am writing this letter in an attempt to avoid filing a motion with the Missouri Public Service Commission to reopen the record. Specifically, can you please provide me with an explanation regarding the large discrepancy between the reported voice-grade equivalent business access lines that TCG provided to Staff and the reported voice-grade equivalent business access lines that TCG reported to SWBT?

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Mr. Carl Lumley  
May 1, 2002  
Page 2

Since objections to Staff's Late Filed Exhibit 23 are due on May 9, 2002, I would appreciate a response to this letter by the close of business on May 7, 2002. I can be reached at (314) 235-4094. I look forward to hearing from you.

Very truly yours,

A handwritten signature in black ink, appearing to read "Mimi B. MacDonald", written in a cursive style.

Mimi B. MacDonald

cc: Ms. Rebecca B. DeCook