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 Southwestern Bell

August 28, 1997

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

FILED

AUG 29 1997

MISSOURI
PUBLIC SERVICE COMMISSION

Re: Case No. TW-97-333

Dear Mr. Wright:

I am writing to advise that Southwestern Bell Telephone Company does not have any objections to the admission of late-filed Exhibits 34, 42, 43 and 44 which were filed by Staff on August 20, 1997, subject to the opportunity to offer our comments on these Exhibits.

We realize that the preparation of these Exhibits required significant work on Staff's part and we appreciate their efforts. But due to the time required to assemble them and the date they were filed, we were not able to incorporate them into our Reply Brief filed on August 22, 1997.

Had we been able to cite these Exhibits in our briefs, we would have pointed out that Staff's return calling study confirmed our analysis that the predominance of COS return calling has been generated by improper use of COS by Internet service providers. Specifically, we would direct the Commission's attention to Exhibit 34, which provides information about the top 200 COS subscribers receiving COS return calls (from target to petitioning exchanges) where Southwestern Bell serves the target exchange. Nineteen of the top 29 COS subscribers from this group of 200 were the **. Of the total ** minutes of return calling for the entire 200 customers, ** accounted for ** of those minutes (or ** % of the total usage for the top 200 customers). If another Internet access provider's usage is added (** **), the minutes of return calling jumps to ** minutes which represent ** % of the total. This group, which comprises 10% of the 200 COS users being studied, is responsible for ** % of those 200 customers' return calling traffic.

We would appreciate your making these comments available to the Commission.

Very truly yours,


Leo J. Bub

cc: Attorneys of Record

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