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November 7, 2000

FILED³

NOV 07 2000

The Honorable Dale Hardy Roberts
Secretary/Chief Regulatory Law Judge
Missouri Public Service Commission
200 Madison Street, Suite 100
Jefferson City, MO 65101

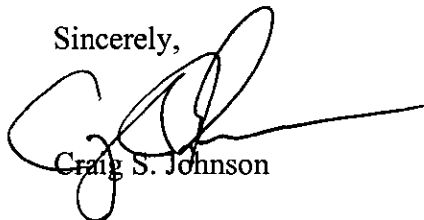
Missouri Public
Service Commission

Re: TO-2000-667

Dear Mr. Roberts:

Enclosed please find an original and 8 copies of the MITG's Motion to Compel Southwestern Bell to Answer Data Requests. A copy of this letter and a copy of the enclosed Motion has been served upon all attorneys of record. Thank you for seeing this filed and brought to the Commission's attention.

Sincerely,



Craig S. Johnson

CSJ/dl

Encl.

cc: Mid-Mo Managers
Office of the Public Counsel
Paul G. Land/Leo J. Bub
Paul S. DeFord
General Counsel

W. R. England III/Brian T. McCartney
Kevin Zarling
Charles Brent Stewart

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

3
NOV 07 2000
Missouri Public
Service Commission

**In the Matter of the Investigation into the)
Effective Availability for Resale of South-)
western Bell Telephone Company's Local)
Plus Service by Interexchange Companies)
and Facilities-Based Competitive Local)
Exchange Companies.)**

Case No. TO-2000-667

**MITG Motion to Compel Southwestern Bell Telephone Company
to Answer Data Requests**

Comes now the MITG and hereby moves the Commission to order SWB to answer the following MITG Data Requests to SWB:

- A. October 5, 2000 DR # 1.
- B. October 16, 2000 DRs # 1, 2, 3, 4, 5, 6, 7, 8, and 9.

SWB has unresolved objections pending to all of the above data requests except for October 16 DRs # 2, 3, and 9, which simply have not been answered although the time for doing so is past. In support hereof, the MITG sets forth the following:

1. Pursuant to 4 CSR 240-2.090(8), counsel for the MITG certifies that he has in good faith conferred with counsel for SWB concerning this matter, and he and counsel for SWB have participated in an telephone conference with the presiding officer, RLJ Morris Woodruff.
2. By Order of August 22, 2000, the Commission concluded that the issues raised by the MITG and STCG may appropriately be addressed in this case. These issues included how SWB or resellers will record this traffic, identify it as traffic for which intraLATA terminating access is due for LECs, what systems will be utilized for creating

records, possibly passing records, and billing and collecting for terminating compensation.

3. The Commission's September 17, 1998 Report and Order in TT-98-351 held that it is appropriate to use terminating access as the method of intercompany compensation for LP traffic terminating to third party LECs. This Order was based on an extensive evaluation of concerns the small companies had with the translations, recordings, and passing of terminating access billing records for "non 1+" dialed LP calls. In its testimony, SWB assured the Commission and other Missouri LECs that once the network reconfigurations were in place, Local Plus traffic will be measured the same as any other terminating traffic, and that SWB would measure LP traffic terminating to other LECs, and that the independent companies would be allowed to audit its billing mechanism.

4. SWB implemented LP beginning in December of 1998.

5. As a result of a network test on July 16 and 17, 2000, SWB discovered that it was not making LP recordings and passing terminating compensation billing records. In August SWB has notified Missouri LECs that in certain SWB Ericsson switches SWB failed to correctly implement switch translations necessary to produce an access billing record. SWB has indicated this problem only existed with some Ericsson switches, the problem has been corrected, and the problem does not exist with any other switch types. MITG has yet to be convinced of these assertions.

6. On August 29, the MITG sent SWB data requests designed to verify that SWB's assurances were correct. In response thereto, SWB provided copies of internal communications regarding the initial setup of Local Plus systems, the discovery of the

problem, and correction of the problem. These communications indicated translation and billing record creation problems which were different in nature than SWB had presented. Based upon these responses of SWB, and upon the network test results, the MITG submitted the data requests now in dispute.

7. Copies of the data requests in dispute, and SWB's objections thereto, are attached hereto. MITG will now present the data requests, objections, and reasons why the Commission should order SWB to answer them.

October 16 Data Requests 2, 3, and 9

8. October 16 Data Requests 2, 3 and 9 have not been objected to or answer in the required time frame. These data requests read as follows:

DR2: Your response to the MITG August 29, 2000 DR # 10 attaches an August 11, 2000, 1:34PM email/communication from Joyce Dunlap to Alan Kern and others. This communication states "we are recording the calls at Marshall and Slater but as call code 1 rather than call code 6". Please produce copies of these records, either magnetic tape, electronic medium, or paper, for all such calls terminating to Mid-Missouri Telephone Company from December 1998 to the present. Also please produce copies, either magnetic tape, electronic medium or paper, for all call code 1 records pulled to get a sense of the volumes the communication was discussing.

DR3: Your response to the MITG August 29, 2000 DR # 10 attaches a September 6, 2000, 3:41PM email/communication from Joyce Dunlap to Linda Krohn and others. This communication states that "several 816 NXX codes are MCA codes and they are bolded". Please state what call codes that calls from these MCA codes to ILECs outside the MCA have been assigned by SWB in the past (back to 1992), specifying the dates for which each call code assigned was in use.

DR9: Your response to the MITG August 29, 2000 DR # 10 attaches a September 13, 2000, 5:24PM email/communication from Linda Krohn to Joyce Dunlap and others. With respect to the verbatums pulled on various of the Kansas calls, Boonville, Glasgow, New Franklin, and Independence calls which made an 006 record, please produce copies of all records, either magnetic tape, electronic medium, or paper, for all such verbatums.

The MITG requests a Commission Order directing SWB to answer these data requests by December 4, 2000.

October 5, 2000 Data Request 1

9. The October 5, 2000 Data Request number 1 was based upon "unmatched call records" produced by the July 16 and 17 network test for Mid-Missouri Telephone Company and Northeast Missouri Rural Telephone Company. These companies received call information including an originating customer or calling number, but SWB failed to provide a terminating access billing record. Mid-Missouri and Northeast went through the individual unmatched call records, and selected approximately 105, or 1/3 to 1/2 of these call records, and served a data request asking SWB to state whether the caller was then a LP subscriber, and to provide a copy of the customer's bill for the period covering July 16-17, 2000. The calls selected were designed to verify SWB's assurances that its LP recording problems were limited to some but not all Ericsson switches. Calls were selected from the 660 area code, the 816 area code, the 913 area code.

SWB objected on the grounds the data request was overly broad and burdensome, and not calculated to lead to the discovery of relevant information.

SWB obtained approval of LP upon the assurance it would properly record LP traffic. For over a year and a half SWB failed to live up to this assurance, and only discovered its failure because of the network test. SWB has over 2 million customers. It is unknown to MITG precisely how many subscribe to LP Service. Because of SWB's failures, the only information available to test SWB's "assurances" is the network test results. MITG does not believe it is overly burdensome for SWB to provide the requested information for 105 calls/customers. The requested information will allow the

MITG to verify whether or not SWB's assurances appear to be correct based on the only information available to make this verification. This is very relevant to the issue of the efficacy of SWB's systems utilized to create terminating compensation records, passing those records, and the billing, payment, and collection of LP terminating compensation.

The MITG requests a Commission Order directing SWB to answer and provide the documents requested by December 4, 2000.

October 16, Data Requests 1, 4, 5, 6, 7, and 8

10. The internal communication documents SWB produced in response to the August 29, 2000 data requests contained references to activities or records which appeared to the MITG to be relevant to terminating compensation. The following are these data requests and SWB's objections thereto:

DR1: Your response to the MITG August 29, 2000 DR # 5 attaches a December 12, 1998 email/communication from Murphy to Dunlap, and a February 24, 1999 email/communication from Dunlap to Kerr. Both communications refer to a budget that Joe Murphy is working on. Please produce copies of all such original, revised, and final budgets, as well as all updated budgets, together with any documentation supporting or upon which such budget or budget drafts were based.

Objection: Irrelevant and would not lead to the discovery of relevant information.

DR4: Your response to the MITG August 29, 2000 DR # 10 attaches a September 13, 2000, 5:24PM email/communication from Linda Krohn to Joyce Dunlap and others. This communication lists several "problems encountered as we looked for the attached records". Please produce copies of all records, either magnetic tape, electronic medium, or paper, for all traffic terminating to MITG companies, separately broken out by Local Plus traffic, Designated Number traffic, other intraLATA toll traffic, or wireless originated traffic.

Objection: Overbroad, burdensome, seeks for most part irrelevant information. With exception of LP problem with isolated Ericsson switches, already provided to your clients in ordinary course of business.

DR5: Your response to the MITG August 29, 2000 DR # 10 attaches a September 13, 2000, 5:24PM email/communication from Linda Krohn to Joyce Dunlap and others. With respect to the problem encountered in Blue Springs, Grain Valley, Nashua, Smithville, Adrian, Archie, and McGee DS1, did the problem discovered mean that no terminating records for any terminating access traffic was created? If not, please explain the extent of records not created or passed due to this problem. If so, please state the date back to which this problem was created or has existed.

Objection: Seeks information about work being done to pursue discrepancies identified during records test conducted in Case No. 99-593, has nothing to do with Local Plus or issues being investigated in this case. Not relevant to this case.

DR6: Your response to the MITG August 29, 2000 DR # 10 attaches a September 13, 2000, 5:24PM email/communication from Linda Krohn to Joyce Dunlap and others. With respect to the problem encountered in the McGee Tandem, please state the date back to which this problem was created or has existed. Does this mistake mean that all calls from the Kansas City LATA to Mid-Missouri were coded using the Kansas 913 NPA number? If so, were terminating access records passed to Mid-Missouri while the 913 NPA was programmed? If not, please state why not.

Objection: Seeks information about work being done to pursue discrepancies identified during records test conducted in Case No. 99-593, has nothing to do with Local Plus or issues being investigated in this case. Not relevant to this case.

DR7: Your response to the MITG August 29, 2000 DR # 10 attaches a September 13, 2000, 5:24PM email/communication from Linda Krohn to Joyce Dunlap and others. With respect to the problem encountered in Kirksville, Armstrong, Boonville, Downing, Edina, Fayette, Glasgow, Higbee, Lancaster, and New Franklin, please explain why OCA calls to Mid-Missouri codes should not have been making an 006 record. Please state the date back to which OCA customer calls to Mid-Missouri codes were programmed to make an 006 code. Does this mean that since that date OCA customer calls to ILECs other than Mid-Missouri have generated an 001 code? If not, please state what call code was generated.

Objection: Seeks information about work being done to pursue discrepancies identified during records test conducted in Case No. 99-593, has nothing to do with Local Plus or issues being investigated in this case. Not relevant to this case.

DR8: Your response to the MITG August 29, 2000 DR # 10 attaches a September 13, 2000, 5:24PM email/communication from Linda Krohn to Joyce Dunlap and others. Please state what further call details that were received from or communicated by Mary Wallace for the Springfield area. Please produce copies of all such communications from Mary Wallace or others regarding the Springfield area.

Objection: Seeks information about work being done to pursue discrepancies identified during records test conducted in Case No. 99-593, has nothing to do with Local Plus or issues being investigated in this case. Not relevant to this case.

All of the email communications referenced in and precipitating these data requests were produced by SWB in response to a data request in this case. They were produced in response to data requests that SWB accepted as being within the scope of this case. Now SWB generally asserts that they are not.

DR #1 was directed to two separate communications referencing a budget regarding Local Plus. Because SWB has not created or preserved the records from which the amount of LP traffic terminated to small ILECs can be determined, this budget may be the only historical document setting forth SWB's estimate of amounts of LP traffic, amounts terminating to non-SWB LECs which would generate terminating access compensation. The communications referencing the budget in process were dated December 12, 1998 and February 24, 1999, the time during which SWB has admitted it was not preparing terminating compensation records. SWB's contention that this information is not relevant here should be rejected.

DR # 4 was directed to a SWB September 13 email listing "several problems encountered as we looked for the attached records". This communication was made at about the same time SWB was supposedly verifying that the LP recording problem was limited to some Ericcson switches. The MITG believes that the records that SWB was reviewing at the time are necessary to understand the nature of the problems SWB encountered. If the records indicate that LP calls are among the types of calls for which problems were encountered, this is certainly relevant. If the records indicated that the problems encountered do not include LP traffic, that result may or may not be relevant

depending upon the nature of the problems encountered. The Commission should remember that SWB sends many types of traffic over the same interconnection that it sends LP traffic. The nature of problems encountered with other forms of traffic may be very relevant. It is necessary to review the records to make this determination. SWB will be protected from inappropriate disclosures by the Protective Order in this case.

DR # 5-8 were all directed to a September 13, 2000 SWB internal email identifying a multitude of problems encountered with the witches/translations/recordings in SWB exchanges.

One portion of the September 13 email identified a problem for 7 exchanges that the MITG believes are not served by Ericcson switches, supposedly the only switches not making LP records. All of these exchanges are SWB exchanges in the Kansas City LATA, and MITG members can receive terminating LP traffic originating from these exchanges. DR # 5 requests information as to the consequences of the problem discovered, in other words whether the problem resulted in the failure to create terminating compensation records, the extent of records not created or passed, and the date since which this problem had existed. This problem could effect LP traffic, or any other traffic SWB sends. As LP and other traffic are indistinguishable by the MITG members, this information is necessary to identify the extent of LP record problems, and verify SWB's statements those problems were limited to a few Ericcson switches. This is relevant.

One portion of the September 13 email identified a problem encountered with SWB's McGee tandem indicating SWB had assigned Mid-Missouri a 913 NPA instead of a 660 NPA. DR # 6 asked the date back to which this error occurred, the consequences

of the error, and what effect it had on terminating compensation records provided to Mid-Mo. As LP could have originated from any SWB exchange served by the McGee tandem and terminated to Mid-Missouri, the consequences of this error are relevant to this case.

One portion of the September 13 email identifies a problem SWB encountered in several exchanges not served by Ericsson switches, and also contains SWB's statement that OCA calls to Mid-Missouri codes should not have been making an 006 record. As Mr. Hughes direct testimony in this case states, for terminating traffic for which terminating compensation is due, 006 is the proper code. OCA service is a toll service, and OCA calls terminating to MITG members traverses the same network connection as does terminating LP, and terminating access is due. Data request # 7 asks SWB to state how far back 006 codes were used, whether 001 code (local, no compensation) was used for ILECs other than Mid-Missouri. This information is not germane only to LP traffic compensation, but it is germane and necessary to understand what translation changes SWB is making to correctly record and pay terminating access. SWB's claim that it is appropriate to code terminating LP with code 006 to generate terminating access appears inconsistent with this email stating OCA should not have been coded with 006, and for SWB to now be coding OCA as 001. Code 001 is the same code that killed terminating LP compensation records. This DR is relevant to understanding SWB's code and translation systems that SWB must properly manage in order to pay proper terminating compensation. It is not enough to merely accept SWB's assertions it is properly doing so. These assertions must be tested.

Another portion of the September 13 email references SWB's intention to conduct similar verification tests in the Springfield LATA. DR # 8 merely asked for

communications regarding the results of such efforts. SWB makes LP available in the Springfield LATA on the same basis as in the other LATAs, and the results of SWB checks of the performance of its translations and switches in creating terminating access records is relevant.

Finally, a portion of the September 13 email makes reference to "verbatim" switch records SWB pulled for various Kansas, Booneville, Glasgow, New Franklin, and Independence calls, which according to the email made an 006 record. The data request merely asks for paper or electronic copies of the records SWB pulled for review purposes. Apparently these are the records SWB used to verify that the past problem with Ericsson switches (Booneville, Glasgow, and New Franklin) were corrected. MITG is not sure what problem or correction was being verified for Kansas or Independence.. If any of the calls on this verbatim report were OCA calls, according to this same memo those calls were not generating an 006 record. Copies of the verbatim call records SWB utilized to ascertain that these problems were corrected, or that 006 records are properly being generated, are relevant

WHEREFORE, on the basis of the foregoing, the MITG respectfully requests that the Commission overrule SWB's objections, and order SWB to provide answers and the documents requested for MITG's October 5, 2000 DR # 1, and for MITG's October 16, 2000 DRs # 1, 2, 3, 4, 5, 6, 7, 8, and 9, on or before December 4, 2000.

ANDERECK, EVANS, MILNE,
PEACE & JOHNSON, L.L.C.

By 

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700 East Capitol
Post Office Box 1438
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Telephone: (573) 634-3422
Facsimile: (573) 634-7822

ATTORNEYS FOR MITG

CERTIFICATE OF SERVICE

The undersigned does hereby certify that a true and accurate copy of the foregoing was mailed, via U.S. Mail, postage prepaid, this 7 day of November, 2000, to all attorneys of record in this proceeding.


Craig S. Johnson MO Bar No. 28179

Leo Bub
Counsel, Southwestern Bell Telephone Company
Data Request from MITG
to Southwestern Bell Telephone Company
October 5, 2000
TO-2000-667

1. For the SWB customers with the following telephone numbers, please state whether the customer was a Local Plus subscriber on July 16 and 17, 2000. Please provide a copy of each customer's bill from SWB for services provided by SWB for the billing period(s) including July 16 and 17, 2000. SWB can redact highly confidential information such as non-LP call detail before producing copies of the bills.

Customer Number	Local Plus Subscriber?
660-263-6940	_____
660-338-2068	_____
660-338-5170	_____
660-848-3149	_____
660-882-2125	_____
660-882-5593	_____
660-882-6463	_____
660-882-7213	_____
816-220-7300	_____
816-220-8958	_____
816-221-1490	_____
816-228-2081	_____
816-228-8719	_____
816-421-2902	_____
816-517-5646	_____
816-532-4323	_____
816-532-8372	_____
816-734-9483	_____
816-338-5650	_____
816-847-3435	_____
816-847-5546	_____
913-248-8998	_____
913-268-0534	_____
913-268-5755	_____
913-281-5717	_____
913-331-8954	_____
913-327-9805	_____
913-328-7006	_____
913-334-5024	_____

913-341-6778
913-341-8218
913-362-6295
913-369-3841
913-371-6634
913-385-7866
913-390-5132
913-393-0653
913-397-9996
913-397-9997
913-441-1226
913-441-4038
913-469-5440
913-492-3400
913-541-0516
913-557-9209
913-585-1800
913-631-0777
913-642-3723
913-648-0614
913-649-6914
913-671-7293
913-671-8381
913-681-1921
913-682-1167
913-685-4610
913-782-7521
913-782-8529
913-888-4551
913-890-6800

660-258-2099
660-263-0975
660-263-5513
660-265-3741
660-271-6447
660-379-2652
660-379-2667
660-397-2685
660-379-2756
660-397-2842
660-397-3200
660-397-3323
660-397-3940
660-457-3734

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Leo J. Bub
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**VIA FACSIMILE &
U.S. MAIL**

October 13, 2000

Mr. Craig S. Johnson
Andercock, Evans, Milne,
Peace & Johnson, L.L.C.
700 E. Capitol
P.O. Box 1438
Jefferson City, Missouri 65102

Re: Case No. TO-2000-667

Dear Craig:

I am writing to express Southwestern Bell Telephone Company's objections to the Data Request you sent me by e-mailed on October 5, 2000. In that Data Request, you list approximately 105 telephone numbers and ask us to determine and disclose whether or not the customer was a Local Plus subscriber on July 16 and 17, and to provide a copy of each customer's bill for services provided by SWBT for the billing period or periods including July 16 and 17, 2000.

Southwestern Bell objects to this Data Request on the ground that it is overly broad, unduly burdensome, and seeks the production of information that is neither relevant to the matter being investigated in this case nor calculated to lead to the discovery of relevant information. To prepare an answer to this DR, Southwestern Bell would be required to divert one or more of its employees from their normal responsibilities for several hours to research each of these customer accounts, pull and copy the bills. Southwestern Bell does not believe it is appropriate for it to have to shoulder this burden, especially when the information sought is of such questionable relevance.

Please call me with any questions or if you would like to discuss this objection.

Very truly yours,

Leo J. Bub

October 16, 2000
Additional Data Requests
From: MITG
To: SWB
Re: TO-2000-667, Local Plus Resale

DR1: Your response to the MITG August 29, 2000 DR # 5 attaches a December 12, 1998 email/communication from Murphy to Dunlap, and a February 24, 1999 email/communication from Dunlap to Kerr. Both communications refer to a budget that Joe Murphy is working on. Please produce copies of all such original, revised, and final budgets, as well as all updated budgets, together with any documentation supporting or upon which such budget or budget drafts were based.

DR2: Your response to the MITG August 29, 2000 DR # 10 attaches an August 11, 2000, 1:34PM email/communication from Joyce Dunlap to Alan Kern and others. This communication states "we are recording the calls at Marshall and Slater but as call code 1 rather than call code 6". Please produce copies of these records, either magnetic tape, electronic medium, or paper, for all such calls terminating to Mid-Missouri Telephone Company from December 1998 to the present. Also please produce copies, either magnetic tape, electronic medium or paper, for all call code 1 records pulled to get a sense of the volumes the communication was discussing.

DR3: Your response to the MITG August 29, 2000 DR # 10 attaches a September 6, 2000, 3:41PM email/communication from Joyce Dunlap to Linda Krohn and others. This communication states that "several 816 NXX codes are MCA codes and they are bolded". Please state what call codes that calls from these MCA codes to ILECs outside the MCA have been assigned by SWB in the past (back to 1992), specifying the dates for which each call code assigned was in use.

DR4: Your response to the MITG August 29, 2000 DR # 10 attaches a September 13, 2000, 5:24PM email/communication from Linda Krohn to Joyce Dunlap and others. This communication lists several "problems encountered as we looked for the attached records". Please produce copies of all records, either magnetic tape, electronic medium, or paper, for all traffic terminating to MITG companies, separately broken out by Local Plus traffic, Designated Number traffic, other intraLATA toll traffic, or wireless originated traffic.

DR5: Your response to the MITG August 29, 2000 DR # 10 attaches a September 13, 2000, 5:24PM email/communication from Linda Krohn to Joyce Dunlap and others. With respect to the problem encountered in Blue Springs, Grain Valley, Nashua, Smithville, Adrian, Archie, and McGee DS1, did the problem discovered mean that no terminating records for any terminating access traffic was created? If not, please explain the extent of records not created or passed due to this problem. If so, please state the date back to which this problem was created or has existed.

DR6: Your response to the MITG August 29, 2000 DR # 10 attaches a September 13, 2000, 5:24PM email/communication from Linda Krohn to Joyce Dunlap and others. With respect to the problem encountered in the McGee Tandem, please state the date back to which this problem was created or has existed. Does this mistake mean that all calls from the Kansas City LATA to Mid-Missouri were coded using the Kansas 913 NPA number? If so, were terminating access records passed to Mid-Missouri while the 913 NPA was programmed? If not, please state why not.

DR7: Your response to the MITG August 29, 2000 DR # 10 attaches a September 13, 2000, 5:24PM email/communication from Linda Krohn to Joyce Dunlap and others. With respect to the problem encountered in Kirksville, Armstrong, Boonville, Downing, Edina, Fayette, Glasgow, Higbee, Lancaster, and New Franklin, please explain why OCA calls to Mid-Missouri codes should not have been making an 006 record. Please state the date back to which OCA customer calls to Mid-Missouri codes were programmed to make an 006 code. Does this mean that since that date OCA customer calls to ILECs other than Mid-Missouri have generated an 001 code? If not, please state what call code was generated.

DR8: Your response to the MITG August 29, 2000 DR # 10 attaches a September 13, 2000, 5:24PM email/communication from Linda Krohn to Joyce Dunlap and others. Please state what further call details that were received from or communicated by Mary Wallace for the Springfield area. Please produce copies of all such communications from Mary Wallace or others regarding the Springfield area.

DR9: Your response to the MITG August 29, 2000 DR # 10 attaches a September 13, 2000, 5:24PM email/communication from Linda Krohn to Joyce Dunlap and others. With respect to the verbatums pulled on various of the Kansas calls, Boonville, Glasgow, New Franklin, and Independence calls which made an 006 record, please produce copies of all records, either magnetic tape, electronic medium, or paper, for all such verbatums.

Return-Path: <lb7809@momail.sbc.com>
From: "BUB, LEO J (Legal)" <lb7809@momail.sbc.com>
To: "Johnson, Craig" <cjohnson@aempb.com>
Subject: SWBT Objections to DR's in Case No. 2000-667 (Local Plus Resale)
Date: Thu, 26 Oct 2000 17:21:15 -0500
X-Rcpt-To: <cjohnson@aempb.com>
X-DPOP: DPOP Version 2.8i

Craig,

We've reviewed the DRs you e-mailed to us on October 16, 2000 and believe that nearly all of them go way beyond the scope of the Local Plus case.

DR No. 1, which seeks our company's budget information, has no relevance to any issue in the case and we do not see how it could lead to the discovery of relevant information.

DR No. 4, which seeks copies of all records for all traffic terminating to MITG companies, separately broken out by traffic type, is overbroad, burdensome, and for the most part seeks irrelevant information. And with the exception of the Local Plus traffic that we did not record because of our isolated problem with our Ericsson switches, that information has already been provided to your clients in the ordinary course of business.

DR Nos. 5-8, which seek information about the work we have been doing to pursue records discrepancies identified during the records test being conducted in Case No. 99-593, has nothing to do with Local Plus or the issues being investigated in this case. The subjects discussed in the e-mails you reference in these DRs are things the industry is investigating in Case No. 99-593. But they have no relevance to this case.

Craig, if you'd like, we can add these objections to the list of items we need to cover next week. Leo

Leo J. Bub
Senior Counsel - Missouri Area
One Bell Center, Room 3518
St. Louis, MO 63101

tel. (314) 235-2508
fax (314) 247-0017

* * * Transmission Result Report (MemoryTX) (Nov. 3. 2000 12:02PM) * * *

1) ANDERECK LAW FIRM
2)

Date/Time: Nov. 3. 2000 11:55AM

File No. Mode	Destination	Pg(s)	Result	Page Not Sent
1916 Memory TX	5226175	P. 8	E-3) 3)	P.1~8

Reason for error
E.1) Hang up or line fail
E.3) No answer

E.2) Busy
E.4) No facsimile connection

ANDERECK, EVANS, MILNE, PEACE & JOHNSON, L.L.C.

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FAX 573-634-3422

November 3, 2000

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ROBERT A. VIDGAR
GEORGE M. JOHNSON
KEVIN L. PEACE
WILLIAM S. LEWIS
VICTOR S. SCOTT

CONY K. HERRON
MATTHEW M. BROOKS
LAWRENCE L. COOK
SHAWN M. COOK
BOB TROWBRIDGE
JOSEPH M. PEACE
LESA C. CHASE
OP CORNELI
MARVIN L. REAR
PATRICIA A. HARRISON
GREGORY C. STOCKARD (204-998-
7181) HALL (204-998-7181)

Via Fax Transmission

Morris Woodruff (Fax: 522-6175)
Regulatory Law Judge
Missouri Public Service Commission
P. O. Box 360
Jefferson City, MO 65102

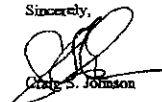
Mr. Leo Bul, Counsel (Fax: 314-331-2193)
Southwestern Bell Telephone Company
One Bell Center, Room 3518
St. Louis, MO 63101

Re: TO-2000-667

Dear Morris and Leo:

Enclosed are the Data Requests and Objections in question for the November 6, 2000 conference call. I will initiate the conference call from my own phone which, if I know how to use it, has conference call capabilities.

Sincerely,


Craig S. Johnson

CSJ:tr
Enc.

TELEPHONE OFFICE
16 AND WASHINGTON
P.O. BOX 361
JEFFERSON CITY, MISSOURI 65102-0361
FAX 573-634-3422

SPRINGFIELD OFFICE
1112 S. CLAYTON
P.O. BOX 420
SPRINGFIELD, MISSOURI 65804-0420
FAX 417-885-4967

PRINCETON OFFICE
307 N. WASHINGTON
PRINCETON, MISSOURI 64657
FAX 816-334-4422

SPRINGFIELD OFFICE
10 S. MAIN STREET
P.O. BOX 864
SPRINGFIELD, MISSOURI 65801-0864
FAX 417-885-4967

* * * Transmission Result Report (MemoryTX) (Nov. 3. 2000 11:59AM) * * *

1) ANDERECK LAW FIRM
2)

Date/Time: Nov. 3. 2000 11:55AM

File No. Mode	Destination	Pg(s)	Result	Page Not Sent
1917 Memory TX	13143312193	P. 8	OK	

Reason for error
E.1) Hang up or line fail
E.3) No answer
E.2) Busy
E.4) No facsimile connection

ANDERECK, EVANS, MILNE, PEACE & JOHNSON, L.L.C.

ATTORNEYS AT LAW
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700 EAST GENTRY
COR. DAKWIN MARSHALLS FOLKS
JEFFERSON CITY, MISSOURI 65102-1438
TELEPHONE 573-434-3432
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November 3, 2000
SUSAN E. ANDERECK
TERRY M. EVANS
ERWIN L. MILNE
JACK PEACE
CHRIS S. JOHNSON
KORIN A. WIDGER
GEORGE M. JOHNSON
REVERLY J. HUGH
WILLIAM S. LEWIS
VICTOR S. SCOTT
CORY E. HERRON
MATTHEW M. BROOK
JANETTE A. COUCH
SHAWN WATKINS
RON TROWBRIDGE
JOSEPH M. PAGE
LISA C. CHASE
OSCAR GONZALEZ
MARTIN L. HARRP
PATRICK A. BALDWIN
GREGORY C. STOCKARD (936-1995)
PHIL BLAUKE (936-1991)

Via Fax Transmission

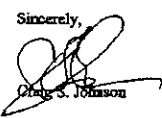
Morris Woodruff (Fax: 522-6175)
Regulatory Law Judge
Missouri Public Service Commission
P. O. Box 360
Jefferson City, MO 65102

Mr. Leo Bub, Counsel (Fax: 314-331-2193)
Southwestern Bell Telephone Company
One Bell Center, Room 3518
St. Louis, MO 63101

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CSJ:tr
Enc.

* * * Transmission Result Report (MemoryTX) (Nov. 6. 2000 3:08PM) * * *

1) ANDERECK LAW FIRM
2)

Date/Time: Nov. 6. 2000 3:06PM

File No. Mode	Destination	Pg(s)	Result	Page Not Sent
1949 Memory TX	5266010	P. 8	OK	

Reason for error
E.1) Hang up or line fail
E.3) No answer

E.2) Busy
E.4) No facsimile connection

302

ANDERECK, EVANS, MILNE, PEACE & JOHNSON, L.L.C.

ATTORNEYS AT LAW

P.O. BOX 1408

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FAX 573-434-7223

November 3, 2000

EUGENE E. ANDERECK
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ERWIN L. MILNE
JACK PEACE
CRAG S. JOHNSON
ROBERT A. VEDGER
GEORGE M. JOHNSON
MYRELL J. FICE
WILLIAM S. LEWIS
VICTOR S. SCOTT

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MATTHEW M. ECKHART
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SHAWN MATTAGLER
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LISA C. CHASE
OF COUNSEL
MARVYN L. SHARP
PATRICK A. HANMERIKER
GREGORY C. STECHARD (1994-1995)
PHIL HAECK (1994-1995)

Via Fax Transmission

Morris Woodruff (Fax: 522-6175)
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P. O. Box 360
Jefferson City, MO 65102

FAXED

Mr. Leo Bub, Counsel (Fax: 314-331-2193)
Southwestern Bell Telephone Company
One Bell Center, Room 3518
St. Louis, MO 63101

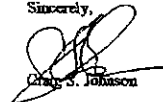
FAXED

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Craig S. Johnson

CSJ:n
Enc.

TELEPHONE OFFICE
1111 S. GLENDEN
P.O. BOX 347
JEFFERSON CITY, MISSOURI 65102-0347
800-379-2204
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FAX 417-884-4957

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JEFFERSON CITY, MISSOURI 65101
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