

Leo J. Bub  
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Southwestern Bell Telephone  
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April 17, 1997

FILED

APR 18 1997

MISSOURI  
PUBLIC SERVICE COMMISSION

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 Southwestern Bell Telephone Company's Motion To Shorten Time For Discovery Responses Or For Leave To Supplement Rebuttal Testimony.

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 black ink, appearing to read "Leo J. Bub".

Leo J. Bub

Enclosures

cc: Attorneys of Record

FILED

APR 18 1997

BEFORE THE PUBLIC SERVICE COMMISSION  
OF THE STATE OF MISSOURI

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  
)

**SOUTHWESTERN BELL TELEPHONE COMPANY'S  
MOTION TO SHORTEN TIME FOR DISCOVERY RESPONSES  
OR FOR LEAVE TO SUPPLEMENT REBUTTAL TESTIMONY**

Southwestern Bell Telephone Company respectfully requests the Commission to Order certain companies within the Small Telephone Company Group and the Mid-Missouri Telephone Company Group to answer Data Requests within 10 days. Alternatively, Southwestern Bell requests leave to supplement its Rebuttal Testimony to include information from answers to these Data Requests in its testimony. In support of its Motion, Southwestern Bell states:

1. On Thursday, April 17, 1997, Southwestern Bell served the attached Data Requests by facsimile on certain members of the Small Telephone Company Group (ALLTEL, BPS Telephone Company, Cass County Telephone Company, Craw-Kan Telephone Company, Goodman Telephone Company, Grand River Telephone Company, Green Hills Telephone Company, KLM Telephone Company, Kingdom Telephone Company, Mark Twain Rural Telephone Company, New Florence Telephone Company, New London Telephone Company, and Stoutland Telephone Company) and the Mid-Missouri Group (Chariton Valley Telephone Company, Mid-Missouri Telephone Company, Northeast Telephone Company, and Modern Telephone Company). The need for the information requested in these Data Requests comes from questions raised from Southwestern Bell's review of its records and those provided in response to previous Data Requests submitted in this case.

2. Under the procedural schedule in this case, Rebuttal Testimony must be filed by Friday, May 2, 1997. In order to be able to use the information requested in the attached Data

26.


Requests in its Rebuttal Testimony, Southwestern Bell must have responses to these requests within 10 days.

3. Alternatively, Southwestern Bell requests leave to supplement its Rebuttal Testimony on May 12, 1997, with information received from these Data Requests if the Small Telephone Company and Mid-Missouri Groups need the full 20 days to answer the Data Requests.

WHEREFORE, Southwestern Bell respectfully requests the Commission to Order the designated companies within the Small Telephone and Mid-Missouri Groups to provide answers to the attached Data Requests within 10 days. Alternatively, Southwestern Bell respectfully requests the Commission to grant it leave to supplement its Rebuttal Testimony on May 12 to incorporate information it will receive from these companies in response to its Data Requests.

Respectfully submitted,

SOUTHWESTERN BELL TELEPHONE COMPANY

By   
PAUL G. LANE #27011  
LEO J. BUB #34326  
ANTHONY K CONROY #35199  
DIANA J. HARTER #31424

Attorneys for Southwestern Bell  
Telephone Company  
100 N. Tucker, Room 630  
St. Louis, Missouri 63101  
314-247-3060 (Telephone)  
314-247-0881 (Fax)

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

In the Matter of an Investigation Into the Provision of                    ) Case No. TW-97-333  
Community Optional Service in Missouri                                    )

**SOUTHWESTERN BELL TELEPHONE COMPANY'S**  
**THIRD SET OF DATA REQUESTS**

COMES NOW Southwestern Bell Telephone Company (SWBT) and propounds the following Data Requests (Nos. 5-14) to Chariton Valley Telephone Company, Mid-Missouri Telephone Company, Northeast Missouri Rural Telephone Company, and Modern Telephone Company in accordance with the rules of the Missouri Public Service Commission. These requests are continuing in nature and the responses must be updated as needed to remain accurate. Each response will be subject to the following conditions:

A. SWBT requests the data requests/data information pursuant to Rule 4 C.S.R. 240-2.090.

B. "You" and "your" refers to each individual member of the company, its agents, employees and any person acting on behalf of the responding company.

C. In answering these requests, all information is to be divulged which is possessed by or available to you. If in your response you state you relied upon or in any manner used, in whole or in part, SWBT supplied data or information, please set forth the specific data/information relied upon and the source of that information, including but not limited to: the name of the individual supplying the information and the date supplied, the number of the data request from which the data/information was obtained, and the response document relied upon together with the page, section and line number within the document.

D. "Documents" or "documentation" include writings, drawings, memoranda, correspondence, graphs, charts, photographs and other data compilations from which information

can be obtained and translated, if necessary, through detection devices into reasonably usable form. This request includes the original or principal copy in your possession, custody or control, and any non-identical copy (which is different from the original because of notations on such copy or otherwise), and any drafts, copies or other preliminary material different in any way from the final document.

E. For each document produced, identify the numbered data request to which it responds.

F. "Person" shall mean the plural as well as the singular and shall include any natural person and any firm, association, partnership, joint venture, corporation, governmental or public entity, department, agency, office or any other form of legal entity.

G. To "identify" a person shall mean to state with respect thereto: (1) his, her, or its name and last known address and, in addition, if a natural person, his or her last known non-business address; and (2) if a natural person, the name and last known business address of his or her employer, the employment position held by such employee with each employer and the date when such employment began or ceased.

H. To "identify" a document means to state its type or otherwise describe it, and in addition to supply the following information where applicable: (1) the name of the person who prepared it; (2) the name of the person who signed it or in whose name it was issued; (3) the name of each person to whom it was addressed or distributed; (4) the nature and substance of the writing, with sufficient particularity to enable it to be identified; and (5) its date, or if it bears no date, its approximate date.

I. When asked for a rationale or explanation for a position shall mean to relate as completely as possible each and every act, omission, incident, event, condition, circumstance, or thing directly or indirectly concerning the subject matter of the description, listing all pertinent

dates, documents, communications, persons and locations applicable to the event or occurrence that is the subject of the data request.


J. The term company shall include all employees, representatives, and agents of the telephone companies listed above.

K. These requests are intended to be of a continuing nature, requiring you to serve timely supplemental answers setting forth any information subsequently discovered which would add to or alter the accuracy or completeness of the information originally provided. Objections will be made at the time of the hearing to any attempt to try to introduce evidence which is directly sought by this data request and to which no disclosure has been made.

L. For each response provided, identify the name of the individual responding and the date supplied. The person signing or identified as responsible for the response certifies that the information provided to SWBT in response to the information requested is accurate and complete and contains no material misrepresentations or omissions based upon present facts known to the person(s) who signs as responsible for the answers

Respectfully submitted,

SOUTHWESTERN BELL TELEPHONE COMPANY

By   
Paul G. Lane  
Leo J. Bub  
Diana J. Harter

Attorneys for Southwestern Bell Telephone Company  
100 North Tucker, Room 630  
St. Louis, Missouri 63101-1976  
(314) 247-3060

SOUTHWESTERN BELL TELEPHONE COMPANY  
DATA REQUEST NO. 5

Requested From: Chariton Valley Telephone Company, Mid-Missouri Telephone Company, Northeast Missouri Rural Telephone Company, and Modern Telephone Company

Date Requested: April 16, 1997

Information Requested:

For each of your company official telephone access lines which subscribe to COS, please provide the following for each month beginning January 1996 through March 1997:

- A. Telephone number
- B. Is usage from more than one line being attributed to that telephone number? If so, specify the number of lines or explain how that attribution occurs in the network and/or billing system. Are each of those lines subscribed to COS and being billed for COS?
- C. What COS route is the line subscribed to?
- D. COS minutes of use associated with the telephone number.

Requested by: Alan Kern

Information Provided:

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Southwestern Bell Telephone Company (SWBT) requests the above data/information pursuant to Rule 4 C.S.R. 240-2.090.

The information provided to Southwestern Bell Telephone Company in response to the above data request is accurate and complete, and contains no material misrepresentations or omissions based upon present facts known to the undersigned. The undersigned agrees to immediately inform Southwestern Bell Telephone Company if any matters are discovered which would materially affect the accuracy or completeness of the information provided in response to the above information.

Date Response Received: \_\_\_\_\_

Signed By: \_\_\_\_\_

Prepared By: \_\_\_\_\_

SOUTHWESTERN BELL TELEPHONE COMPANY  
DATA REQUEST NO. 6

Requested From: Chariton Valley Telephone Company, Mid-Missouri Telephone Company, Northeast Missouri Rural Telephone Company, and Modern Telephone Company

Date Requested: April 16, 1997

Information Requested:

For any access line of one of your telephone company affiliates that subscribe to COS, please identify the affiliate and provide the following by affiliate for each month beginning January 1996 through March 1997:

- A. Telephone number.
- B. Is usage from more than one line being attributed to that telephone number? If so, specify the number of lines or explain how that attribution occurs in the network and/or billing system. Are each of those lines subscribed to COS and being billed for COS?
- C. What COS route is the line subscribed to?
- D. COS minutes of use associated with the telephone number.

Requested by: Alan Kern

Information Provided:

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Southwestern Bell Telephone Company (SWBT) requests the above data/information pursuant to Rule 4 C.S.R. 240-2.090.

The information provided to Southwestern Bell Telephone Company in response to the above data request is accurate and complete, and contains no material misrepresentations or omissions based upon present facts known to the undersigned. The undersigned agrees to immediately inform Southwestern Bell Telephone Company if any matters are discovered which would materially affect the accuracy or completeness of the information provided in response to the above information.

Date Response Received: \_\_\_\_\_

Signed By: \_\_\_\_\_

Prepared By: \_\_\_\_\_



SOUTHWESTERN BELL TELEPHONE COMPANY  
DATA REQUEST NO. 7

Requested From: Chariton Valley Telephone Company, Mid-Missouri Telephone Company, Northeast Missouri Rural Telephone Company, and Modern Telephone Company

Date Requested: April 16, 1997

Information Requested:

Are any of your company official access lines which are subscribed to COS used by your company to access the Internet?

Requested by: Alan Kern

Information Provided:

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Southwestern Bell Telephone Company (SWBT) requests the above data/information pursuant to Rule 4 C.S.R. 240-2.090.

The information provided to Southwestern Bell Telephone Company in response to the above data request is accurate and complete, and contains no material misrepresentations or omissions based upon present facts known to the undersigned. The undersigned agrees to immediately inform Southwestern Bell Telephone Company if any matters are discovered which would materially affect the accuracy or completeness of the information provided in response to the above information.

Date Response Received: \_\_\_\_\_

Signed By: \_\_\_\_\_

Prepared By: \_\_\_\_\_

SOUTHWESTERN BELL TELEPHONE COMPANY  
DATA REQUEST NO. 8

Requested From: Chariton Valley Telephone Company, Mid-Missouri Telephone Company, Northeast Missouri Rural Telephone Company, and Modern Telephone Company

Date Requested: April 16, 1997

Information Requested:

If yes to No. 7 above:

- A. How many lines are being used for Internet access?
- B. What telephone numbers are assigned to these lines?
- C. How much COS usage is generated by these lines?

Requested by: Alan Kern

Information Provided:

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Southwestern Bell Telephone Company (SWBT) requests the above data/information pursuant to Rule 4 C.S.R. 240-2.090.

The information provided to Southwestern Bell Telephone Company in response to the above data request is accurate and complete, and contains no material misrepresentations or omissions based upon present facts known to the undersigned. The undersigned agrees to immediately inform Southwestern Bell Telephone Company if any matters are discovered which would materially affect the accuracy or completeness of the information provided in response to the above information.

Date Response Received: \_\_\_\_\_

Signed By: \_\_\_\_\_

Prepared By: \_\_\_\_\_

SOUTHWESTERN BELL TELEPHONE COMPANY  
DATA REQUEST NO. 9

Requested From: Chariton Valley Telephone Company, Mid-Missouri Telephone Company, Northeast Missouri Rural Telephone Company, and Modern Telephone Company

Date Requested: April 16, 1997

Information Requested:

Are any of your company official access lines which are subscribed to COS being used in the provision of Internet access service to any of your end user customers?

Requested by: Alan Kern

Information Provided:

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Southwestern Bell Telephone Company (SWBT) requests the above data/information pursuant to Rule 4 C.S.R. 240-2.090.

The information provided to Southwestern Bell Telephone Company in response to the above data request is accurate and complete, and contains no material misrepresentations or omissions based upon present facts known to the undersigned. The undersigned agrees to immediately inform Southwestern Bell Telephone Company if any matters are discovered which would materially affect the accuracy or completeness of the information provided in response to the above information.

Date Response Received: \_\_\_\_\_

Signed By: \_\_\_\_\_

Prepared By: \_\_\_\_\_

SOUTHWESTERN BELL TELEPHONE COMPANY  
DATA REQUEST NO. 10

Requested From: Chariton Valley Telephone Company, Mid-Missouri Telephone Company, Northeast Missouri Rural Telephone Company, and Modern Telephone Company

Date Requested: April 16, 1997

Information Requested:

If yes to No. 9 above:

- A. How many lines are being used for Internet access?
- B. What telephone numbers are assigned to these lines?
- C. How much usage is generated by these lines?

Requested by: Alan Kern

Information Provided:

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Southwestern Bell Telephone Company (SWBT) requests the above data/information pursuant to Rule 4 C.S.R. 240-2.090.

The information provided to Southwestern Bell Telephone Company in response to the above data request is accurate and complete, and contains no material misrepresentations or omissions based upon present facts known to the undersigned. The undersigned agrees to immediately inform Southwestern Bell Telephone Company if any matters are discovered which would materially affect the accuracy or completeness of the information provided in response to the above information.

Date Response Received: \_\_\_\_\_

Signed By: \_\_\_\_\_

Prepared By: \_\_\_\_\_

SOUTHWESTERN BELL TELEPHONE COMPANY  
DATA REQUEST NO. 11

Requested From: Chariton Valley Telephone Company, Mid-Missouri Telephone Company, Northeast Missouri Rural Telephone Company, and Modern Telephone Company

Date Requested: April 16, 1997

Information Requested:

Other than for Internet access purposes, are any of your company official access lines which are subscribed to COS being used to aggregate the usage of multiple end users?

Requested by: Alan Kern

Information Provided:

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Southwestern Bell Telephone Company (SWBT) requests the above data/information pursuant to Rule 4 C.S.R. 240-2.090.

The information provided to Southwestern Bell Telephone Company in response to the above data request is accurate and complete, and contains no material misrepresentations or omissions based upon present facts known to the undersigned. The undersigned agrees to immediately inform Southwestern Bell Telephone Company if any matters are discovered which would materially affect the accuracy or completeness of the information provided in response to the above information.

Date Response Received: \_\_\_\_\_

Signed By: \_\_\_\_\_

Prepared By: \_\_\_\_\_

SOUTHWESTERN BELL TELEPHONE COMPANY  
DATA REQUEST NO. 12

Requested From: Chariton Valley Telephone Company, Mid-Missouri Telephone Company, Northeast Missouri Rural Telephone Company, and Modern Telephone Company

Date Requested: April 16, 1997

Information Requested:

If yes to No. 11 above:

- A. How many lines are being used for Internet access?
- B. What telephone numbers are assigned to these lines?
- C. How much usage is generated by these lines?

Requested by: Alan Kern

Information Provided:

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Southwestern Bell Telephone Company (SWBT) requests the above data/information pursuant to Rule 4 C.S.R. 240-2.090.

The information provided to Southwestern Bell Telephone Company in response to the above data request is accurate and complete, and contains no material misrepresentations or omissions based upon present facts known to the undersigned. The undersigned agrees to immediately inform Southwestern Bell Telephone Company if any matters are discovered which would materially affect the accuracy or completeness of the information provided in response to the above information.

Date Response Received: \_\_\_\_\_

Signed By: \_\_\_\_\_

Prepared By: \_\_\_\_\_

CASE NO. TW-97-333  
SOUTHWESTERN BELL TELEPHONE COMPANY  
DATA REQUEST NO. 13

Requested From: Chariton Valley Telephone Company, Mid-Missouri Telephone Company, Northeast Missouri Rural Telephone Company, and Modern Telephone Company

Date Requested: April 16, 1997

Information Requested:

Is your company using COS in the provision of any service, COS or other, to any customer in any non-COS petitioning exchange?

- A. If so, provide a complete description of such service(s) and identify the exchange(s) in which such service(s) is provided.
- B. Explain any specific network or billing system arrangements utilized to facilitate such service(s).

Requested by: Alan Kern

Information Provided:

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Southwestern Bell Telephone Company (SWBT) requests the above data/information pursuant to Rule 4 C.S.R. 240-2.090.

The information provided to Southwestern Bell Telephone Company in response to the above data request is accurate and complete, and contains no material misrepresentations or omissions based upon present facts known to the undersigned. The undersigned agrees to immediately inform Southwestern Bell Telephone Company if any matters are discovered which would materially affect the accuracy or completeness of the information provided in response to the above information.

Date Response Received: \_\_\_\_\_

Signed By: \_\_\_\_\_

Prepared By: \_\_\_\_\_

CASE NO. TW-97-333  
SOUTHWESTERN BELL TELEPHONE COMPANY  
DATA REQUEST NO. 14

Requested From: Chariton Valley Telephone Company, Mid-Missouri Telephone Company, Northeast Missouri Rural Telephone Company, and Modern Telephone Company

Date Requested: April 16, 1997

Information Requested:

Please identify each employee of your company by name and title who performed any function in establishing your company as a subscriber to COS or in determining how your company would utilize such service.

Requested by: Alan Kern

Information Provided:

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Southwestern Bell Telephone Company (SWBT) requests the above data/information pursuant to Rule 4 C.S.R. 240-2.090.

The information provided to Southwestern Bell Telephone Company in response to the above data request is accurate and complete, and contains no material misrepresentations or omissions based upon present facts known to the undersigned. The undersigned agrees to immediately inform Southwestern Bell Telephone Company if any matters are discovered which would materially affect the accuracy or completeness of the information provided in response to the above information.

Date Response Received: \_\_\_\_\_

Signed By: \_\_\_\_\_

Prepared By: \_\_\_\_\_



BEFORE THE PUBLIC SERVICE COMMISSION

STATE OF MISSOURI

In the Matter of an Investigation Into the Provision of ) Case No. TW-97-333  
Community Optional Service in Missouri )

SOUTHWESTERN BELL TELEPHONE COMPANY'S  
THIRD SET OF DATA REQUESTS

COMES NOW Southwestern Bell Telephone Company (SWBT) and propounds the following Data Requests (Nos. 5-14) to ALLTEL Telephone Service Corporation, BPS Telephone Company, Cass County Telephone Company, Craw-Kan Telephone Company, Goodman Telephone Company, Grand River Mutual Telephone Company, Green Hills Telephone Company, KLM Telephone Company, Kingdom Telephone Company, Mark Twain Rural Telephone Company, New Florence Telephone Company, New London Telephone Company, and Stoutland Telephone Company in accordance with the rules of the Missouri Public Service Commission. Mark Twain Rural Telephone Company will also receive Data Request No. 15. These requests are continuing in nature and the responses must be updated as needed to remain accurate. Each response will be subject to the following conditions:

A. SWBT requests the data requests/data information pursuant to Rule 4 C.S.R. 240-2.090.

B. "You" and "your" refers to each individual member of the company, its agents, employees and any person acting on behalf of the responding company.

C. In answering these requests, all information is to be divulged which is possessed by or available to you. If in your response you state you relied upon or in any manner used, in whole or in part, SWBT supplied data or information, please set forth the specific data/information relied upon and the source of that information, including but not limited to: the name of the individual supplying the information and the date supplied, the number of the data

request from which the data information was obtained, and the response document relied upon together with the page, section and line number within the document.

D. "Documents" or "documentation" include writings, drawings, memoranda, correspondence, graphs, charts, photographs and other data compilations from which information can be obtained and translated, if necessary, through detection devices into reasonably usable form. This request includes the original or principal copy in your possession, custody or control, and any non-identical copy (which is different from the original because of notations on such copy or otherwise), and any drafts, copies or other preliminary material different in any way from the final document.

E. For each document produced, identify the numbered data request to which it responds.

F. "Person" shall mean the plural as well as the singular and shall include any natural person and any firm, association, partnership, joint venture, corporation, governmental or public entity, department, agency, office or any other form of legal entity.

G. To "identify" a person shall mean to state with respect thereto: (1) his, her, or its name and last known address and, in addition, if a natural person, his or her last known non-business address; and (2) if a natural person, the name and last known business address of his or her employer, the employment position held by such employee with each employer and the date when such employment began or ceased.

H. To "identify" a document means to state its type or otherwise describe it, and in addition to supply the following information where applicable: (1) the name of the person who prepared it; (2) the name of the person who signed it or in whose name it was issued; (3) the name of each person to whom it was addressed or distributed; (4) the nature and substance of the writing, with sufficient particularity to enable it to be identified; and (5) its date, or if it bears no date, its approximate date.

I. When asked for a rational or explanation for a position shall mean to relate as completely as possible each and every act, omission, incident, event, condition, circumstance, or thing directly or indirectly concerning the subject matter of the description, listing all pertinent dates, documents, communications, persons and locations applicable to the event or occurrence that is the subject of the data request.

J. The term company shall include all employees, representatives, and agents of the telephone companies listed above.

K. These requests are intended to be of a continuing nature, requiring you to serve timely supplemental answers setting forth any information subsequently discovered which would add to or alter the accuracy or completeness of the information originally provided. Objections will be made at the time of the hearing to any attempt to try to introduce evidence which is directly sought by this data request and to which no disclosure has been made.

L. For each response provided, identify the name of the individual responding and the date supplied. The person signing or identified as responsible for the response certifies that the information provided to SWBT in response to the information requested is accurate and complete and contains no material misrepresentations or omissions based upon present facts known to the person(s) who signs as responsible for the answers

Respectfully submitted,

SOUTHWESTERN BELL TELEPHONE COMPANY

By Leo J. Bub  
Paul G. Lane  
Leo J. Bub  
Diana J. Harter

Attorneys for Southwestern Bell Telephone Company  
100 North Tucker, Room 630  
St. Louis, Missouri 63101-1976  
(314) 247-3060

CASE NO. TW-97-333  
SOUTHWESTERN BELL TELEPHONE COMPANY  
DATA REQUEST NO. 5

Requested From: ALLTEL Telephone Service Corporation, BPS Telephone Company, Cass County Telephone Company, Craw-Kan Telephone Company, Goodman Telephone Company, Grand River Mutual Telephone Company, Green Hills Telephone Company, KLM Telephone Company, Kingdom Telephone Company, Mark Twain Rural Telephone Company, New Florence Telephone Company, New London Telephone Company, and Stoutland Telephone Company

Date Requested: April 16, 1997

Information Requested:

For each of your company official telephone access lines which subscribe to COS, please provide the following for each month beginning January 1996 through March 1997:

- A. Telephone number
- B. Is usage from more than one line being attributed to that telephone number? If so, specify the number of lines or explain how that attribution occurs in the network and/or billing system. Are each of those lines subscribed to COS and being billed for COS?
- C. What COS route is the line subscribed to?
- D. COS minutes of use associated with the telephone number.

Requested by: Alan Kern

Information Provided:

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Southwestern Bell Telephone Company (SWBT) requests the above data/information pursuant to Rule 4 C.S.R. 240-2.090.

The information provided to Southwestern Bell Telephone Company in response to the above data request is accurate and complete, and contains no material misrepresentations or omissions based upon present facts known to the undersigned. The undersigned agrees to immediately inform Southwestern Bell Telephone Company if any matters are discovered which would materially affect the accuracy or completeness of the information provided in response to the above information.

Date Response Received: \_\_\_\_\_

Signed By: \_\_\_\_\_

Prepared By: \_\_\_\_\_

SOUTHWESTERN BELL TELEPHONE COMPANY  
DATA REQUEST NO. 6

Requested From: ALLTEL Telephone Service Corporation, BPS Telephone Company, Cass County Telephone Company, Craw-Kan Telephone Company, Goodman Telephone Company, Grand River Mutual Telephone Company, Green Hills Telephone Company, KLM Telephone Company, Kingdom Telephone Company, Mark Twain Rural Telephone Company, New Florence Telephone Company, New London Telephone Company, and Stoutland Telephone Company

Date Requested: April 16, 1997

Information Requested:

For any access line of one of your telephone company affiliates that subscribe to COS, please identify the affiliate and provide the following by affiliate for each month beginning January 1996 through March 1997:

- A. Telephone number.
- B. Is usage from more than one line being attributed to that telephone number? If so, specify the number of lines or explain how that attribution occurs in the network and/or billing system. Are each of those lines subscribed to COS and being billed for COS?
- C. What COS route is the line subscribed to?
- D. COS minutes of use associated with the telephone number.

Requested by: Alan Kern

Information Provided:

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Southwestern Bell Telephone Company (SWBT) requests the above data/information pursuant to Rule 4 C.S.R. 240-2.090.

The information provided to Southwestern Bell Telephone Company in response to the above data request is accurate and complete, and contains no material misrepresentations or omissions based upon present facts known to the undersigned. The undersigned agrees to immediately inform Southwestern Bell Telephone Company if any matters are discovered which would materially affect the accuracy or completeness of the information provided in response to the above information.

Date Response Received: \_\_\_\_\_

Signed By: \_\_\_\_\_

Prepared By: \_\_\_\_\_

CASE NO. TW-97-333  
SOUTHWESTERN BELL TELEPHONE COMPANY  
DATA REQUEST NO. 7

Requested From: ALLTEL Telephone Service Corporation, BPS Telephone Company, Cass County Telephone Company, Craw-Kan Telephone Company, Goodman Telephone Company, Grand River Mutual Telephone Company, Green Hills Telephone Company, KLM Telephone Company, Kingdom Telephone Company, Mark Twain Rural Telephone Company, New Florence Telephone Company, New London Telephone Company, and Stoutland Telephone Company

Date Requested: April 16, 1997

Information Requested:

Are any of your company official access lines which are subscribed to COS used by your company to access the Internet?

Requested by: Alan Kern

Information Provided:

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Southwestern Bell Telephone Company (SWBT) requests the above data/information pursuant to Rule 4 C.S.R. 240-2.090.

The information provided to Southwestern Bell Telephone Company in response to the above data request is accurate and complete, and contains no material misrepresentations or omissions based upon present facts known to the undersigned. The undersigned agrees to immediately inform Southwestern Bell Telephone Company if any matters are discovered which would materially affect the accuracy or completeness of the information provided in response to the above information.

Date Response Received: \_\_\_\_\_

Signed By: \_\_\_\_\_

Prepared By: \_\_\_\_\_

SOUTHWESTERN BELL TELEPHONE COMPANY  
DATA REQUEST NO. 8

Requested From: ALLTEL Telephone Service Corporation, BPS Telephone Company, Cass County Telephone Company, Craw-Kan Telephone Company, Goodman Telephone Company, Grand River Mutual Telephone Company, Green Hills Telephone Company, KLM Telephone Company, Kingdom Telephone Company, Mark Twain Rural Telephone Company, New Florence Telephone Company, New London Telephone Company, and Stoutland Telephone Company

Date Requested: April 16, 1997

Information Requested:

If yes to No. 7 above:

- A. How many lines are being used for Internet access?
- B. What telephone numbers are assigned to these lines?
- C. How much COS usage is generated by these lines?

Requested by: Alan Kern

Information Provided:

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Southwestern Bell Telephone Company (SWBT) requests the above data/information pursuant to Rule 4 C.S.R. 240-2.090.

The information provided to Southwestern Bell Telephone Company in response to the above data request is accurate and complete, and contains no material misrepresentations or omissions based upon present facts known to the undersigned. The undersigned agrees to immediately inform Southwestern Bell Telephone Company if any matters are discovered which would materially affect the accuracy or completeness of the information provided in response to the above information.

Date Response Received: \_\_\_\_\_

Signed By: \_\_\_\_\_

Prepared By: \_\_\_\_\_

SOUTHWESTERN BELL TELEPHONE COMPANY  
DATA REQUEST NO. 9

Requested From: ALLTEL Telephone Service Corporation, BPS Telephone Company, Cass County Telephone Company, Craw-Kan Telephone Company, Goodman Telephone Company, Grand River Mutual Telephone Company, Green Hills Telephone Company, KLM Telephone Company, Kingdom Telephone Company, Mark Twain Rural Telephone Company, New Florence Telephone Company, New London Telephone Company, and Stoutland Telephone Company

Date Requested: April 16, 1997

Information Requested:

Are any of your company official access lines which are subscribed to COS being used in the provision of Internet access service to any of your end user customers?

Requested by: Alan Kern

Information Provided:

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Southwestern Bell Telephone Company (SWBT) requests the above data/information pursuant to Rule 4 C.S.R. 240-2.090.

The information provided to Southwestern Bell Telephone Company in response to the above data request is accurate and complete, and contains no material misrepresentations or omissions based upon present facts known to the undersigned. The undersigned agrees to immediately inform Southwestern Bell Telephone Company if any matters are discovered which would materially affect the accuracy or completeness of the information provided in response to the above information.

Date Response Received: \_\_\_\_\_

Signed By: \_\_\_\_\_

Prepared By: \_\_\_\_\_



CASE NO. TW-97-333  
SOUTHWESTERN BELL TELEPHONE COMPANY  
DATA REQUEST NO. 10

Requested From: ALLTEL Telephone Service Corporation, BPS Telephone Company, Cass County Telephone Company, Craw-Kan Telephone Company, Goodman Telephone Company, Grand River Mutual Telephone Company, Green Hills Telephone Company, KLM Telephone Company, Kingdom Telephone Company, Mark Twain Rural Telephone Company, New Florence Telephone Company, New London Telephone Company, and Stoutland Telephone Company

Date Requested: April 16, 1997

Information Requested:

If yes to No. 9 above:

- A. How many lines are being used for Internet access?
- B. What telephone numbers are assigned to these lines?
- C. How much usage is generated by these lines?

Requested by: Alan Kern

Information Provided:

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Southwestern Bell Telephone Company (SWBT) requests the above data/information pursuant to Rule 4 C.S.R. 240-2.090.

The information provided to Southwestern Bell Telephone Company in response to the above data request is accurate and complete, and contains no material misrepresentations or omissions based upon present facts known to the undersigned. The undersigned agrees to immediately inform Southwestern Bell Telephone Company if any matters are discovered which would materially affect the accuracy or completeness of the information provided in response to the above information.

Date Response Received: \_\_\_\_\_

Signed By: \_\_\_\_\_

Prepared By: \_\_\_\_\_

CASE NO. TW-97-333  
SOUTHWESTERN BELL TELEPHONE COMPANY  
DATA REQUEST NO. 11

Requested From: ALLTEL Telephone Service Corporation, BPS Telephone Company, Cass County Telephone Company, Craw-Kan Telephone Company, Goodman Telephone Company, Grand River Mutual Telephone Company, Green Hills Telephone Company, KLM Telephone Company, Kingdom Telephone Company, Mark Twain Rural Telephone Company, New Florence Telephone Company, New London Telephone Company, and Stoutland Telephone Company

Date Requested: April 16, 1997

Information Requested:

Other than for Internet access purposes, are any of your company official access lines which are subscribed to COS being used to aggregate the usage of multiple end users?

Requested by: Alan Kern

Information Provided:

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Southwestern Bell Telephone Company (SWBT) requests the above data/information pursuant to Rule 4 C.S.R. 240-2.090.

The information provided to Southwestern Bell Telephone Company in response to the above data request is accurate and complete, and contains no material misrepresentations or omissions based upon present facts known to the undersigned. The undersigned agrees to immediately inform Southwestern Bell Telephone Company if any matters are discovered which would materially affect the accuracy or completeness of the information provided in response to the above information.

Date Response Received: \_\_\_\_\_

Signed By: \_\_\_\_\_

Prepared By: \_\_\_\_\_

CASE NO. TW-97-333  
SOUTHWESTERN BELL TELEPHONE COMPANY  
DATA REQUEST NO. 12

Requested From: ALLTEL Telephone Service Corporation, BPS Telephone Company, Cass County Telephone Company, Craw-Kan Telephone Company, Goodman Telephone Company, Grand River Mutual Telephone Company, Green Hills Telephone Company, KLM Telephone Company, Kingdom Telephone Company, Mark Twain Rural Telephone Company, New Florence Telephone Company, New London Telephone Company, and Stoutland Telephone Company

Date Requested: April 16, 1997

Information Requested:

If yes to No. 11 above:

- A. How many lines are being used for Internet access?
- B. What telephone numbers are assigned to these lines?
- C. How much usage is generated by these lines?

Requested by: Alan Kern

Information Provided:

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Southwestern Bell Telephone Company (SWBT) requests the above data/information pursuant to Rule 4 C.S.R. 240-2.090.

The information provided to Southwestern Bell Telephone Company in response to the above data request is accurate and complete, and contains no material misrepresentations or omissions based upon present facts known to the undersigned. The undersigned agrees to immediately inform Southwestern Bell Telephone Company if any matters are discovered which would materially affect the accuracy or completeness of the information provided in response to the above information.

Date Response Received: \_\_\_\_\_

Signed By: \_\_\_\_\_

Prepared By: \_\_\_\_\_

CASE NO. TW-97-333  
SOUTHWESTERN BELL TELEPHONE COMPANY  
DATA REQUEST NO. 13

Requested From: ALLTEL Telephone Service Corporation, BPS Telephone Company, Cass County Telephone Company, Craw-Kan Telephone Company, Goodman Telephone Company, Grand River Mutual Telephone Company, Green Hills Telephone Company, KLM Telephone Company, Kingdom Telephone Company, Mark Twain Rural Telephone Company, New Florence Telephone Company, New London Telephone Company, and Stoutland Telephone Company

Date Requested: April 16, 1997

Information Requested:

Is your company using COS in the provision of any service, COS or other, to any customer in any non-COS petitioning exchange?

- A. If so, provide a complete description of such service(s) and identify the exchange(s) in which such service(s) is provided.
- B. Explain any specific network or billing system arrangements utilized to facilitate such service(s).

Requested by: Alan Kern

Information Provided:

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Southwestern Bell Telephone Company (SWBT) requests the above data/information pursuant to Rule 4 C.S.R. 240-2.090.

The information provided to Southwestern Bell Telephone Company in response to the above data request is accurate and complete, and contains no material misrepresentations or omissions based upon present facts known to the undersigned. The undersigned agrees to immediately inform Southwestern Bell Telephone Company if any matters are discovered which would materially affect the accuracy or completeness of the information provided in response to the above information.

Date Response Received: \_\_\_\_\_

Signed By: \_\_\_\_\_

Prepared By: \_\_\_\_\_

SOUTHWESTERN BELL TELEPHONE COMPANY  
DATA REQUEST NO. 14

Requested From: ALLTEL Telephone Service Corporation, BPS Telephone Company, Cass County Telephone Company, Craw-Kan Telephone Company, Goodman Telephone Company, Grand River Mutual Telephone Company, Green Hills Telephone Company, KLM Telephone Company, Kingdom Telephone Company, Mark Twain Rural Telephone Company, New Florence Telephone Company, New London Telephone Company, and Stoutland Telephone Company

Date Requested: April 16, 1997

Information Requested:

Please identify each employee of your company by name and title who performed any function in establishing your company as a subscriber to COS or in determining how your company would utilize such service.

Requested by: Alan Kern

Information Provided:

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Southwestern Bell Telephone Company (SWBT) requests the above data/information pursuant to Rule 4 C.S.R. 240-2.090.

The information provided to Southwestern Bell Telephone Company in response to the above data request is accurate and complete, and contains no material misrepresentations or omissions based upon present facts known to the undersigned. The undersigned agrees to immediately inform Southwestern Bell Telephone Company if any matters are discovered which would materially affect the accuracy or completeness of the information provided in response to the above information.

Date Response Received: \_\_\_\_\_

Signed By: \_\_\_\_\_

Prepared By: \_\_\_\_\_

CASE NO. TW-97-333  
SOUTHWESTERN BELL TELEPHONE COMPANY  
DATA REQUEST NO. 15

Requested From: Mark Twain Rural Telephone Company

Date Requested: April 16, 1997

Information Requested:

When (on what dates) was Mark Twain Rural first aware that the seven COS routes subsequently implemented on September 11, 1995, passed the COS qualifying criteria? For each route, was Mark Twain's initial development of such calling study data performed at its own initiative, or pursuant to a customer request, Commission directive, or for some other reason? If pursuant to some other reason, what was that reason? For each route, did Mark Twain Rural ask or encourage the petitioning party to file the COS request or petition with the PSC?

Requested by: Alan Kern

Information Provided:

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Southwestern Bell Telephone Company (SWBT) requests the above data/information pursuant to Rule 4 C.S.R. 240-2.090.

The information provided to Southwestern Bell Telephone Company in response to the above data request is accurate and complete, and contains no material misrepresentations or omissions based upon present facts known to the undersigned. The undersigned agrees to immediately inform Southwestern Bell Telephone Company if any matters are discovered which would materially affect the accuracy or completeness of the information provided in response to the above information.

Date Response Received: \_\_\_\_\_

Signed By: \_\_\_\_\_

Prepared By: \_\_\_\_\_

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 17, 1997 with the exception of William England and Craig Johnson who were served by facsimile on that day.



Leo J. Bub

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