BEFORE THE PUBLIC SERVICE COMMISSION OF THE STATE OF MISSOURI

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In the Matter of a Commission Inquiry into the Possibility of Impairment without Unbundled Local Circuit Switching When Serving the Mass Market

Case No. TO-2004-0207

SOUTHWESTERN BELL TELEPHONE, L.P., D/B/A SBC MISSOURI'S RESPONSE TO SAGE TELECOM, INC.'S RESPONSE TO NOTICE SETTING DEADLINE FOR REPLIES

COMES NOW Southwestern Bell Telephone, L.P., d/b/a SBC Missouri ("SBC Missouri"), and for its Response To Sage Telecom, Inc.'s Response to Notice Setting Deadline For Replies states as follows:

1. On January 21, 2004, the Staff of the Missouri Public Service Commission ("Staff") filed its Motion for An Order Regarding SBC's Batch Hot Cut Proposal. In that Motion, Staff asked the Missouri Public Service Commission ("Commission") to issue an Order directing: (1) SBC to file pleadings stating the batch hot cut process that it proposes to use in Missouri; (2) that other parties, except Staff, file their alternative proposal and their views on the adequacy of SBC's proposal; and (3) all parties, except Staff, to file their petitions on whether a Missouri-specific batch hot cut proposal is appropriate and if workshops are necessary.

2. On February 17, 2004, Sage Telecom, Inc. ("Sage") filed its Response to Notice Setting Deadline for Replies. In that Response, Sage indicates that it supports Staff's January 21, 2004 proposal for SBC to file its batch hot cut proposal prior to the date for filing direct testimony.

3. SBC Missouri intended to file its batch hot cut proposal with its Phase II Direct Testimony. SBC Missouri's batch hot cut proposal is the same proposal that SBC is offering in the eleven states that participated in the eleven state collaborative. However, so as to avoid any confusion, attached please find five documents that together form SBC Missouri's batch hot cut proposal in Missouri. These documents will be further described in SBC Missouri's Direct Testimony, when that testimony is filed.

SBC Missouri does not believe that a Missouri-specific batch hot cut 4 process is appropriate. Further, SBC Missouri does not believe that any additional workshops are needed to address the batch hot cut process.

WHEREFORE, for all of the foregoing reasons, SBC Missouri respectfully requests the Commission to deny Staff's Motion, together with any additional relief the Commission deems just and proper.

Respectfully submitted,

SOUTHWESTERN BELL TELEPHONE, L.P.

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CERTIFICATE OF SERVICE

Copies of this document were served on all counsel of record by e-mail on February 24, 2004.

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