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January 20, 2000

Mr. Dale Hardy Roberts
Secretary/Chief Regulatory Law Judge
Missouri Public Service Commission
P.O. Box 360
Jefferson City, Missouri 65102

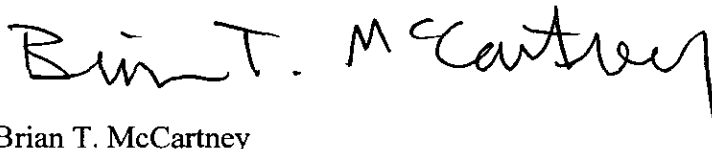
Re: Case No. TC-2000-401
- SWBT v. Seneca and Goodman Telephone Companies

Dear Mr. Roberts:

Enclosed for filing please find an original and fourteen (14) copies of the Answer to Complaint filed on behalf of Seneca and Goodman Telephone Companies in above-referenced case.

Please see that this filing is brought to the attention of the appropriate Commission personnel. A copy of the attached will be provided to parties of record. I thank you in advance for your cooperation in this matter.

Sincerely,



Brian T. McCartney

BTM/da
Enclosure
cc: Parties of Record

FILED
JAN 20 2000

Missouri Public
Service Commission

Southwestern Bell Telephone Company,
Complainant,
v.
Seneca and Goodman Telephone Companies,
Respondents.

FILED

Missouri Public
Service Commission

1. Seneca and Goodman admit the allegations contained in paragraph 1, except that the Companies deny that SWBT is authorized to originate intraLATA interexchange toll traffic, such as the 800 MaxiMizer traffic which is purportedly the subject of SWBT's complaint, in Seneca and Goodman's exchanges following the Commission's termination of the Primary Toll Carrier ("PTC") Plan in Case No. TO-99-254.

2. Admitted.
3. Admitted.
4. Seneca and Goodman deny the allegations contained in paragraph 4 because they

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are based on an inaccurate and misleading interpretation of this Commission's PTC Plan *Report and Order* in Case No. TO-99-254. Specifically, the Companies deny that the PTC Order allowed SWBT to continue to originate intraLATA toll traffic on a Feature Group C ("FGC") basis in Seneca and Goodman's exchanges. The Companies incorporate by reference the arguments contained in their Motion to Dismiss filed concurrently with this complaint.

5. Seneca and Goodman are without sufficient information to form a specific response to the allegation contained in paragraph 5 at this time.

6. Seneca and Goodman are without sufficient information to form a specific response to the allegation contained in paragraph 6 at this time.

7. Admitted.

8. Admitted.

9. Admitted.

10. Seneca and Goodman admit that representatives from large and small LECs have met to discuss the implications of the PTC Plan's termination. During one of these meetings, a representative of one of the former SCs raised the issue of SWBT's 800 traffic that originates in the former SCs' exchanges. Thus, Seneca and Goodman deny SWBT's claim that SWBT raised this issue. Seneca and Goodman also deny that these industry meetings have provided SWBT with any authority or any reason to believe that SWBT has authority to originate intraLATA toll traffic from Seneca and Goodman's exchanges.

11. Denied. (*See the Companies' Motion to Dismiss*)

12. Denied. (*See the Companies' Motion to Dismiss*)

13. Denied.. (*See the Companies' Motion to Dismiss*)

WHEREFORE, on the basis of the foregoing, Seneca and Goodman respectfully request that SWBT's complaint be dismissed on the grounds that: (1) Seneca and Goodman are not in violation of the Commission's PTC *Order* in Case No. TO-99-254, and accordingly, (2) SWBT has failed to state facts upon which relief can be granted.

Respectfully submitted,



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Certificate of Service

I hereby certify that a true and correct copy of the above and foregoing document was mailed or hand-delivered, this 20th day of January, 2000, to:

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