BEFORE THE PUBLIC SERVICE COMMISSION OF THE STATE OF MISSOURI

In The Matter of Sprint Missouri, Inc.)		
Application for Competitive Classification)	Case No.	
Under Section 392.245.5 RSMo. (2005))		

APPLICATION FOR COMPETITIVE CLASSIFICATION

COMES NOW Sprint Missouri, Inc. ("Sprint") and hereby requests the Commission approve Sprint's Application for Competitive Classification Under Section 392.245.5 RSMo. (2005). Sprint is seeking competitive classification for all residential and business services, other than exchange access service, offered in its Jefferson City exchange. In support of its Application, Sprint states as follows:

- 1. Sprint is a public utility, and a telecommunications company, as those terms are defined in Section 386.020(42) and (51), RSMo 2000. Sprint is a large incumbent local exchange telecommunications company and is subject to Price Cap Regulation under Section 392.245
- 2. Missouri Revised Statutes §392.245.5 (2005) allows carriers subject to Price Cap Regulation to seek competitive classification for each telecommunications service offered to business and residential customers, other than exchange access service, in any exchange in which at least two non-affiliated entities are providing basic local telecommunications service to customers within the exchange.
- 3. Sprint faces growing and intense competition from at least two non-affiliated entities in its Jefferson City exchange. More specifically, from numerous non-affiliated wireless

providers and from wireline carriers using their own facilities, in whole or in part, to provide basic local telecommunications services.

- 4. Sprint has numerous non-affiliated wireless providers operating in its Jefferson City exchange providing local service. Exhibit A identifies the following wireless carriers providing local service to business and consumer customers in Sprint's Jefferson City exchange: Cingular, Verizon, Alltel, T-Mobile, and US Cellular (See Exhibit A). Section 392.245.5(1) RSMo. (2005) recognizes that commercial mobile service providers shall be considered as entities providing basic local telecommunications service, provided that only one such non-affiliated provider shall be considered as providing basic local telecommunications service within an exchange.
- 5. Section 392.245.5(2) RSMo (2005), recognizes wireline carriers providing local phone service in whole or in part over telecommunications facilities it owns as competing entities that providing basic local telecommunications services in competition with Sprint. In Sprint's Jefferson City exchange, Mediacom is now providing residential phone service in the exchange using facilities it owns in part or whole. Furthermore, Socket is providing business phone service over facilities it owns in part or whole in Jefferson City.
- 6. As stated, MMC Telephony of Missouri, Inc. (Mediacom) offers local phone service to residential customers in direct competition with Sprint in Sprint's Jefferson City exchange. Mediacom obtained a Certificate to Provide Basic Local, Local Exchange, and Interexchange Telecommunications Services within Missouri, including the exchanges of Sprint, on May 5, 2005 (Case No. LA-2005-0150). It is not a reseller of Sprint's services but uses a combination of its own facilities and facilities of other providers. Mediacom has its own facilities

extensively deployed throughout Jefferson City. Mediacom is not relying upon unbundled network elements from Sprint. According to its website (www.mediacomcc.com), Mediacom offers unlimited local and long distance telephone service with over ten popular calling features and it is aggressively marketing its services to Jefferson City customers. Sprint has experienced competitive losses to Mediacom in Jefferson City.

- 7. In addition, Socket Telecom LLC offers local phone service to business customers in direct competition with Sprint in the Jefferson City exchange. Socket obtained a Certificate to Provide Basic Local, Local Exchange, and Interexchange Telecommunications Services within Missouri, including the exchanges of Sprint, on August 3, 2001 (Case No. Case No. TA-2001-671). Like Mediacom, Socket is not a reseller of Sprint's services but uses a combination of its own facilities and facilities of other providers. Moreover, Socket is not relying upon UNE-P from Sprint to provide its local phone service. According to its website (www.socket.net), Socket offers local telephone service, competitive long distance, custom voice applications, and bundled offerings to business customers and it is aggressively marketing its services to Jefferson City customers. Sprint has experienced competitive loses to Socket in Jefferson City
- 8. Sprint's Application for Competitive Classification does not request any price changes. In fact, Sprint acknowledges that all rates currently in effect for these exchanges will remain in effect until such time Sprint files a tariff requesting a price change. Under current law, Sprint will be required to file tariffs for any future price changes, either increases or decreases, associated with these exchanges which will continue to require Commission approval. Furthermore, Sprint will be required to notify its customers of any future price increase.

WHEREFORE Sprint respectfully requests the Commission approve Sprint's Application for Competitive Classification pursuant to Section 392.245.5 RSMo (2005). Sprint has

demonstrated that at least two non-affiliated entities are providing basic local telecommunications service to customers within its Jefferson City exchange. Sprint's Application meets the statutory requirements for competitive classification and should become effective in no more than 30 days.

Respectfully submitted,

SPRINT MISSOURI, INC.

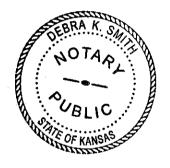
Linda Gardner,

MO Bar #32224

6450 Sprint Parkway KSOPHN0204-2B503 Overland, Park, KS 66251

Voice: 913-315-9234 Fax: 913-523-9837

Email: Linda.gardner@sprint.com



VERIFICATION

I, Linda Gardner, an attorney and duly authorized representative of Sprint Missouri, Inc. hereby verify and affirm that I have read the foregoing Application for Competitive Classification and that the statements contained therein are true and correct to the best of my information and belief.

Linda K. Gardner

Subscribed and sworn to before me on this 31st day of March, 2006.

Notary Public

My Appointment Expires:

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that on this ______ day of March, 2006, a copy of the above and foregoing Application was served via electronic mail to each of the following:

Office of the General Counsel Missouri Public Service Commission P. O. Box 360 Jefferson City, Missouri 65102 gencounsel@psc.mo.gov Office of the Public Counsel P. O. Box 2230 Jefferson City, MO 65101 opcservice@ded.mo.gov

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LIST OF EXHIBITS

Exhibit A Wireless Carriers Operating in Sprint Exchanges

Exhibit B Sprint Proposed Tariff