



2345 GRAND BOULEVARD  
SUITE 2500  
KANSAS CITY, MISSOURI 64108-2684  
816-292-2000, FAX 816-292-2001

1050/40 CORPORATE WOODS  
9401 INDIAN CREEK PARKWAY  
OVERLAND PARK, KANSAS 66210-2007  
816-292-2000, FAX 913-451-0875

July 7, 2000

Dale Hardy Roberts  
Secretary/Chief Regulatory Law Judge  
Missouri Public Service Commission  
P.O. Box 360  
Jefferson City, MO 65101

FILED<sup>2</sup>  
JUL 07 2000  
Missouri Public  
Service Commission

Re: Case No. TO-2000-667

Dear Judge Roberts:

Attached for filing with the Commission is the original and eight (8) copies of AT&T Communications of the Southwest, Inc.'s Suggestions Regarding Limitation of Issues in the above referenced matter.

I thank you in advance for your cooperation in bringing this to the attention of the Commission.

Very truly yours,

LATHROP & GAGE, L.C.

By:   
Paul S. DeFord

Attachment  
cc: All Parties of Record

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

**FILED<sup>3</sup>**  
**JUL 07 2000**

Missouri Public  
Service Commission

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

Case No. TO-2000-667

**SUGGESTIONS REGARDING  
LIMITATION OF ISSUES**

COMES NOW, AT&T Communications of the Southwest, Inc. ("AT&T") and  
submits its Suggestions Regarding Limitation of Issues.

1. On April 20, 2000, the Commission established this docket to investigate the effective availability for resale of Southwestern Bell Telephone Company's (SWBT) Local Plus service by interexchange carriers (IXC) and facilities-based competitive local exchange companies (CLEC). The impetus for this case was a result of concerns raised by AT&T regarding the effective unavailability of Local Plus for resale to IXCs in Case No. TT-2000-258, *In the Matter of Southwestern Bell Telephone Company's Proposed Tariff to Introduce a Discount on the Local Plus Monthly Rate*. AT&T remains extremely concerned that Local Plus is not effectively availability for resale by IXCs and facilities-based CLECs and believes these issues warrant expeditious resolution.

2. On April 24, 2000, the Missouri Independent Telephone Group (MITG) filed an Application to Intervene. On May 9, 2000, the Small Telephone Company Group (STCG) filed an Application to Intervene. In their respective applications, the MITG and

STCG identified issues that were of concern to them. In summary, the issues identified were related to terminating compensation, traffic routing, and record exchange. None of the issues raised by the MITG or the STCG are related to the effective availability of Local Plus for resale on a UNE basis to IXC's or to facilities-based CLECs. Because the issues raised by STCG and MITG are not related to purpose of the immediate investigation, AT&T does not believe that it is appropriate to address the issues raised by STCG and MITG in this case. AT&T and believes that attempting to resolve the extraneous issues raised by the STCG and MITG in this proceeding will significantly delay the procedural schedule in this matter and will distract from the sole purpose of this docket, which is to "investigate the effective availability for resale of Southwestern Bell Telephone Company's Local Plus service by interexchange carriers and facilities-based competitive local exchange companies."<sup>1</sup>

3. In addition, it should be noted that the Commission has already established a forum for these issues to be heard. The Commission established Case No. TO-99-593, *In the Matter of the Investigation into Signaling Protocols, Call Records, Trunking Arrangement, and Traffic Measurement*. This ongoing docket was created to "investigate the issues of signaling protocols, call records, trunking arrangements, and traffic measurement"<sup>2</sup>. Each issue raised by the MITG and STCG in the immediate case are properly before the Commission in Case TO-99-593 and should be addressed in that proceeding rather than burdening the record in this case.

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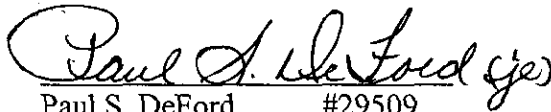
<sup>1</sup> Case No. TO-2000-667, *Investigation into the Effective Availability for Resale of Southwestern Bell Telephone Company's Local Plus Service by Interexchange Carriers and Facilities-Based Competitive Local Exchange Companies*, Order Making Southwestern Bell Telephone Company a Party and Directing Notice, page 1.

<sup>2</sup> Case No. TO-99-593, *In the Matter of the Investigation into Signaling Protocols, Call Records, Trunking Arrangement, and Traffic Measurement*, Order Directing Notice, page 1.

WHEREFORE, AT&T respectfully requests that the Commission exclude from this proceeding the issues suggested by MITG and STCG and limit this proceeding to the issue identified by the Order creating this docket.

Respectfully submitted,

LATHROP & GAGE, L.C.

A handwritten signature in cursive script, reading "Paul S. DeFord (je)".

Paul S. DeFord #29509

LATHROP & GAGE, L.C.

2345 Grand Boulevard

Kansas City, MO 64108

Phone: 816-292-2000

FAX: 816-292-2001

pdeford@lathropgage.com

Kevin K. Zarling TX#22249300

919 Congress, Ste. 900

Austin, TX 78701

Phone: 512-370-2010

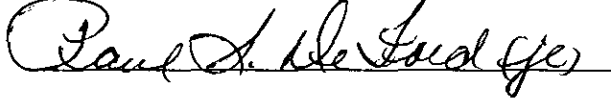
FAX: 512-370-2096

kzarling@att.com

Attorneys for AT&T Communications

CERTIFICATE OF SERVICE BY MAIL

A true and correct copy of the foregoing in Docket TO-2000-667 was served upon the parties identified on the following service list on this 7<sup>th</sup> day of July, 2000 by either hand delivery or placing same in a postage paid envelope and depositing in the U.S. Mail.



Office of Public Counsel  
PO Box 7800  
Jefferson City, MO 65102

General Counsel  
PO Box 360  
Jefferson City, MO 65012

Leo Bub  
Southwestern Bell Telephone Co.  
One Bell Center, Room 3520  
St. Louis, MO 63101

W. R. England III/Brian McCartney  
Brydon, Swearngen & England  
PO Box 456  
Jefferson City, MO 65102

Craig S. Johnson  
Andereck, Evans, Milne, Peace & Baumhoer  
PO Box 1438  
Jefferson City, MO 65102