

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

In the Matter of an Investigation Into Various                     )  
Issues Related to the Missouri Universal Service                )       File No. TO-2012-0257  
Fund.   )

**AT&T MISSOURI’S MOTION TO INTERVENE AND RESPONSE TO  
THE COMMISSION’S ORDER DIRECTING NOTICE AND ESTABLISHING TIME TO  
RESPOND TO MOTION TO DECREASE THE MOUSF ASSESSMENT**

AT&T Missouri<sup>1</sup> hereby moves to intervene in this matter, and further, submits its response to the Commission’s January 25 Order Directing Notice and Establishing Time to Respond to Motion to Decrease Assessment (“Order”). The Commission’s Order was precipitated by Staff’s January 25 Motion, in which Staff asked that the Commission “issue[] an Order on February 1, 2012, that approves a decrease to the current MoUSF assessment percentage from .0029 to .0025, to be implemented by telecommunications companies on April 1, 2012.” Staff’s Motion, at 3.

**Motion to Intervene**

AT&T Missouri respectfully moves the Commission to allow it to intervene in this matter, in accordance with 4 CSR 240-2.075. AT&T Missouri has participated in MoUSF-related matters and proceedings since the fund’s inception in 2002.<sup>2</sup> AT&T Missouri’s interests are different from those of the general public, in that it is both a telecommunications company whose net jurisdictional revenue is subject to MoUSF assessments (*see*, 4 CSR 240-31.060) and a company which bills and collects from its end user customers a surcharge equal to the assessment ordered by the Commission. (*See*, 4 CSR 240-31.065). Moreover, AT&T Missouri’s interests could be adversely affected were

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<sup>1</sup> Southwestern Bell Telephone, L.P., d/b/a AT&T Missouri (“AT&T Missouri”).

<sup>2</sup> On March 21, 2002, the Commission established the Low-Income/Disabled portion of the MoUSF. *See*, Report and Order Establishing Low-Income/Disabled Fund, Case No. TO-98-329 (“Order”).

the Commission to adopt any orders, rules or procedures that could potentially present any obstacles or impediments to AT&T Missouri's implementation of the MoUSF.

### **AT&T Missouri's Response to Staff's Motion**

For the reasons advanced by Staff, AT&T Missouri does not oppose Staff's Motion. However, while AT&T Missouri is prepared to expeditiously implement a decrease in the MoUSF assessment, AT&T Missouri underscores, as does Staff, the importance of allowing "time necessary for the affected carriers to program their billing systems." Staff Motion, at 2. Staff's Motion appropriately allows carriers a 60-day implementation interval. AT&T Missouri requires sufficient time in which to effectuate necessary billing table and other billing system changes so that it can properly and accurately bill its customers a decrease in the MoUSF surcharge which appears in their bills. A customer surcharge increase made effective on April 1 -- but no earlier -- would accommodate these critical processes.

Given these considerations, Therefore, AT&T Missouri does not oppose the Commission's issuance of a February 1 order that would decrease the current MoUSF assessment from .0029 to .0025, effective on, but no earlier than, April 1, 2012.

### **Conclusion**

For the foregoing reasons, AT&T Missouri respectfully requests that the Commission grant its Motion to Intervene, and further, to the extent that the Commission also orders a decrease in the current MoUSF assessment, that the Commission's order doing so be issued no fewer than 60 dates from the date on which the decrease shall become effective and carriers shall be obligated to implement it.

Respectfully submitted,

SOUTHWESTERN BELL TELEPHONE COMPANY,  
D/B/A AT&T MISSOURI

BY 

JEFFREY E. LEWIS #62389  
LEO J. BUB #34326  
ROBERT J. GRYZMALA #32454

One AT&T Center, Room 3516  
St. Louis, Missouri 63101  
(314) 235-6060  
(314) 247-0014 (Fax)  
[robert.gryzmala@att.com](mailto:robert.gryzmala@att.com)

Attorneys for Southwestern Bell Telephone Company,  
d/b/a AT&T Missouri

**CERTIFICATE OF SERVICE**

I hereby certify that copies of the foregoing document were served to each of the below  
by e-mail on January 31, 2012.

  
Robert J. Gryzmala

General Counsel  
Kevin Thompson  
Colleen M. Dale  
Missouri Public Service Commission  
P.O. Box 360  
Jefferson City, MO 65102  
[gencounsel@psc.mo.gov](mailto:gencounsel@psc.mo.gov)  
[kevin.thompson@psc.mo.gov](mailto:kevin.thompson@psc.mo.gov)  
[cully.dale@psc.mo.gov](mailto:cully.dale@psc.mo.gov)

Public Counsel  
Office Of The Public Counsel  
P.O. Box 7800  
Jefferson City, MO 65102  
[opcservice@ded.mo.gov](mailto:opcservice@ded.mo.gov)