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August 21, 2000

FILED³

AUG 21 2000

Missouri Public
Service Commission

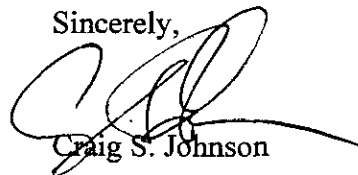
Mr. Dale Hardy Roberts
Chief Regulatory Law Judge
Missouri Public Service Commission
P.O. Box 360
Jefferson City, MO 65102

Re: Case No. TO-2000-667

Dear Mr. Roberts:

Enclosed please find for filing an original plus eight copies of MITG's Supplemental Suggestions With Respect to Scope of Issues. Thank you for seeing this filed.

Sincerely,



Craig S. Johnson

CSJ/mb
Enclosure
cc: Counsel of Record
MITG Managers

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BEFORE THE PUBLIC SERVICE COMMISSION

STATE OF MISSOURI

In the Matter of the Investigation into the)
Effective Ability for Resale of South-)
Western Bell Telephone Company's)
Local Plus Service by Interexchange)
Carriers and Facilities-Based Comp-)
etitive Local Exchange Companies.)

Case No. TO-2000-667

FILED³
AUG 21 2000
Missouri Public
Service Commission

Supplemental Suggestions With Respect to Scope of Issues

COMES NOW the Missouri Independent Telephone Group and hereby requests the Commission to permit it to supplement its prior suggestions regarding the scope of issues to be visited in this docket. Recently, as a result of a coordinated test conducted in TO-99-593, Southwestern Bell apparently "learned" that it has not been properly recording local plus traffic terminating to certain former SC exchanges. We attach copies of Southwestern Bell's communiqués in that regard.

To date, the MITG does not know the wherein's and why's of Southwestern Bell's failure to record such terminating LP traffic, which it was suppose to be recording as far back as December of 1998. We respectfully suggest that pursuit of this issue will lend itself to the Commission's evaluation of whether "resold" local plus can effectively tracked in terminating compensation assured.

ANDERECK, EVANS, MILNE,
PEACE & JOHNSON, L.L.C.

By 

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ATTORNEYS FOR MITG

CERTIFICATE OF SERVICE

The undersigned does hereby certify that a true and accurate copy of the foregoing was mailed, via U.S. Mail, postage prepaid, this 21 day of August, 2000, to all attorneys of record.



Craig S. Johnson

BUB, LEO J (Legal), 01:57 PM 8/17/200, Missouri Records Test

Return-Path: <lb7809@momail.sbc.com>
From: "BUB, LEO J (Legal)" <lb7809@momail.sbc.com>
To: "Dority, Larry" <ldority@sprintmail.com>,
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"Krueger, Keith" <kkruieg01@mail.state.mo.us>,
"Johnson, Craig" <cjohnson@aempb.com>
Subject: Missouri Records Test
Date: Thu, 17 Aug 2000 13:57:55 -0500
X-Rcpt-To: <cjohnson@aempb.com>
X-DPOP: DPOP Version 2.8i

<<8-17-00_.doc>> Attached is a copy of a memo Joyce is sending to her industry counterparts concerning a problem we found and the corrections we made. We thought this information would be helpful for everyone to have in the reconciliation work we are all doing for the records test. Leo



8-17-00_.doc

August 17, 2000

TO: Ed Dunvant - Alltel
Oral Glasco - Alma
Ken Matzdorff - Cass County/Spectra
Bill Biere - Chariton Valley
Kathie Munson - Citizens
Jerry James - Craw-Kan
Steve Gann - Green Hills
Bruce Copsey - Holway
Kathy Faircloth - Iamo
Bill Rohde - MarkTwain
David Jones - Mid-Missouri
Don Stowell - MoKan Dial
Gary Godfery Northeast MO Rural/Modern
Ruth Nelson - GTE
Bob Williams - Oregon Farmers
Phil Johnson - Grand River Mutual/Lathrop
Raymond Henagan - Rock Port
Don Edwards - Sprint

FROM: Joyce L. Dunlap
Area Manager-Industry Relations
One Bell Center, Room 31-P-5
St. Louis, Missouri 63101
314-235-6155

As a result of some preliminary analysis that we have been doing to prepare for the reconciliation part of the Missouri Records Test, Southwestern Bell Telephone discovered on August 4, 2000 that we may have been incorrectly recording Local Plus calls in our Ericsson switches in KnobNoster, Sedalia, Lamonte, Marshall and Slater. It appeared that these calls were being recorded as call code 001 (local) instead of call code 006 (toll). In Missouri, these local 001 records are not pulled into the settlement system therefore no settlement records would be created. After we verified that this problem existed, we immediately took steps to correct it. We can now report that this problem was corrected on a go forward basis August 11, 2000.

To the extent that our Local Plus customers in these exchanges originated calls for termination to one of your exchanges, your company did not receive a settlement record for that traffic. We are currently in the process of determining when this problem started and are verifying that Local Plus is being recorded correctly in our other exchanges throughout the state. At this point, we believe the problem was limited to the Ericsson switches mentioned above. In addition, we are checking to see if there are records that can be provided to your company for billing, or in the alternative working on an estimated retroactive adjustment for this traffic.

At the current time we do not know the magnitude of this correction but believe it will to some extent help narrow the difference between terminating to billing records. As we all move through the reconciliation process we should have a better feel for that amount. We wanted to bring this correction to your attention quickly in case it might aid you in the record analysis you are now doing.

On a go forward basis, you should be seeing additional records as a result of this correction beginning with your September data. It would be helpful if after these records are processed your company could let us know what percentage change you are seeing in your total terminating to billing records.

If you have questions, I can be reached on 314-235-6155.

CC: Bob Schoonmaker – GVNW
Phyllis Callahan – Warinner, Gesinger & Assoc.