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March 8, 2002

FILED³

MAR 08 2002

**Missouri Public
Service Commission**

Secretary of the PSC
Missouri Public Service Commission
P. O. Box 360
Jefferson City, MO 65102

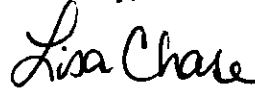
Re: TT-99-428, et al.

Dear Mr. Roberts:

Enclosed please find an original and eight (8) copies of The MITG's Reply to Sprint Spectrum L.P. d/b/a Sprint PCS Response to the Small Company Group's Reply to AT&T and Staff's Responses.

A copy of this letter and copy of the enclosures have been served upon all counsel of record. Thank you for seeing this filed.

Sincerely,



Lisa Cole Chase

LCC:tr

Enc.

cc: MITG Managers
Office of Public Counsel
PSC General Counsel
Paul S. DeFord
Jeanne A. Fischer
James A. Fischer
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FILED³

MAR 08 2002

BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI

Missouri Public
Service Commission

In the Matter of the Mid-Missouri)
Group's Filing to Revise its Access)
Services Tariff, P.S.C.Mo.No. 2)

Case No. TT-99-428 et al.

**MITG'S REPLY TO SPRINT SPECTRUM L.P. d/b/a SPRINT PCS RESPONSE TO THE
SMALL COMPANY GROUP'S REPLY TO AT&T AND STAFF'S RESPONSES**

COMES NOW the Missouri Independent Telephone Group (MITG), and submits the following Reply to Sprint Spectrum L.P. d/b/a Sprint PCS Response to the Small Company Group's Reply to AT&T and Staff's Responses, and states as follows:

1. Sprint's reliance on the portion on the FCC's First Report and Order quoted in Sprint's Reply is only meaningful once an agreement has been entered into between a CMRS provider and a LEC, and approved by the Commission. Enforcing the access tariffs of the MITG companies until interconnection under a reciprocal compensation arrangement has been approved is not inconsistent with the FCC's statement cited by Sprint PCS.

2. Sprint PCS states in its Reply that it's pending action before the FCC against AT&T addresses access charges for only long distance telecommunications. Their claim that the FCC case does not address access charges for intra-MTA traffic is inconsistent with prior testimony. At hearing on December 12, 2000 in Case No. TT-2001-139, the Sprint PCS witness stated that Sprint PCS was seeking compensation from AT&T based on access-type charges, and that Sprint PCS made no distinction between whether the calls delivered by AT&T were intra-MTA or inter-MTA:

- Q. And you have sought compensation based on these access-type charges. Correct?
- A. Yes.
- Q. And you make no distinction between whether those calls delivered to you by AT&T are intra-MTA or inter-MTA; is that right?
- A. For purposes of the filing, I do not believe we made that distinction, no.¹

¹ *Mark Twain Rural Telephone Company's Proposed Tariff to Introduce Wireless Termination Service*, Case No. TT-2001-139, TR. 346-47.

WHEREFORE, for all of the foregoing reasons, the MITG Petitioners request that the Commission deny Respondent Sprint PCS' request that the Complaint be dismissed.

Respectfully Submitted,

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

By 

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ATTORNEYS FOR PETITIONERS

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 8 day of March, 2002, to all attorneys of record in this proceeding.



Lisa Cole Chase Mo Bar No. 51502