## BEFORE THE PUBLIC SERVICE COMMISSION STATE OF MISSOURI

In the Matter of a Commission Inquiry into the Possibility of Impairment without Unbundled Local Circuit Switching When Serving the Mass Market.

Case No. TO-2004-0207

## **POSITION STATEMENT**

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COMES NOW the Sprint Communication Company, L.P. Inc. and Sprint Missouri, Inc.

(collectively referred to as "Sprint") and provide their Position Statement for Phase 1 of this case.

**Issue 1**: For purposes of examining whether there is "non-impairment" in the provision of unbundled local switching to serve mass-market customers, what are the relevant geographic markets within the state of Missouri?

Sprint's Position: The relevant geographic markets within the state of Missouri

for the purpose of examining whether there is non-impairment in the provision of

unbundled local switching are the Metropolitan Statistical Area ("MSAs").

**Issue 2:** For purposes of the 47 CFR 51.319(d)(2)(iii)(B)(3) analysis, how many DS0 lines must be supplied to a multi-line DS0 customer before that customer is considered to be an enterprise customer rather than a mass market customer?

Sprint's Position: More than 10 DS-0s must be supplied before a customer should

be considered an enterprise customer rather than a mass market customer.

Respectfully submitted.

## SPRINT

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## **CERTIFICATE OF SERVICE**

The undersigned hereby certifies that a copy of the above and foregoing was served on each of the following parties by electronic mail this 20 day of January, 2004:

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