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March 26, 2001

Dale Hardy Roberts
Secretary/Chief Regulatory Law Judge
Missouri Public Service Commission
200 Madison Street, Suite 100
P.O. Box 360
Jefferson City, Missouri 65102

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Missouri Public
Service Commission

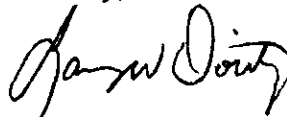
RE: *Southwestern Bell Communications Services, Inc. d/b/a Southwestern Bell Long Distance, Case No. TA-99-47
Tariff File 200100925*

Dear Mr. Roberts:

Enclosed for filing in the above-referenced matter are the original and eight (8) copies of the Response of Southwestern Bell Long Distance to Motion to Suspend, filed on behalf of Southwestern Bell Communications Services, Inc. d/b/a Southwestern Bell Long Distance. A copy of the foregoing Response has been hand-delivered or mailed this date to all parties of record.

Thank you for your attention to this matter.

Sincerely,



Larry W. Dority

/jr

Enclosures

cc: Office of the Public Counsel
Dana K. Joyce, General Counsel
Craig S. Johnson
Kenneth A. Schiffman
Carl J. Lumley/Leland B. Curtis
Paul S. DeFord
W.R. England III./Sondra B. Morgan
Mary Ann (Garr) Young
Richard S. Brownlee III
Edward J. Cadieux

BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI

FILED

MAR 26 2001

Missouri Public
Service Commission

In the matter of the application of)
Southwestern Bell Communications Services,)
Inc., d/b/a Southwestern Bell Long Distance)
for a Certificate of Service Authority to provide)
Interexchange Telecommunications Services)
within the State of Missouri)

Case No. TA-99-47
Tariff File 200100925

RESPONSE OF SOUTHWESTERN BELL LONG DISTANCE
TO
MOTION TO SUSPEND

COMES NOW Southwestern Bell Communications Services, Inc. d/b/a Southwestern Bell Long Distance ("Southwestern Bell Long Distance"), by and through its attorneys, and pursuant to 4 CSR 240-2.080(16), files its Response to the Motion to Suspend ("Motion") filed in this matter by the Missouri Independent Telephone Group ("MITG")¹ on March 16, 2001. For its Response, Southwestern Bell Long Distance respectfully states as follows:

1. MITG's Motion attempts to interject and re-litigate issues which were previously addressed by the Commission in its Report and Order, Case No. TO-99-254, pp. 6-7. More recently, in Case No. TO-99-593, the small telephone companies acknowledged that the issue of Feature Group C versus Feature Group D, which appears to be of primary importance in MITG's Motion, is no longer an issue in that case.²

¹The Missouri Independent Telephone Group consists of Alma, Chariton Valley, Choctaw, Mid-Missouri, Modern, MoKan Dial and Northeast Missouri telephone companies. (Motion, p. 1).

²See Case No. TO-99-593, Position Statement of MITG at page 1; Transcript of Proceedings, Volume 3, page 22.

2. Irrespective of the propriety of MITG's expressed concerns regarding the utilization of Feature Group D signaling, Southwestern Bell Long Distance, as stated in its First Amended Application, will provide Interexchange Telecommunications initially through the resale of services of an underlying carrier which has been certified to operate within Missouri and, as financial and operational conditions warrant in the future, Southwestern Bell Long Distance may provide services over its own facilities. In direct response to the concerns of MITG set forth in Paragraph 6 of their Motion, Southwestern Bell Telephone Company is not the underlying carrier noted above whose services will be resold by Southwestern Bell Long Distance. Indeed, Southwestern Bell Long Distance will utilize Feature Group D signaling of the underlying interexchange carrier whose services will be resold.

3. MITG's Motion is facially devoid of any allegations regarding the merits, legality or reasonableness of Southwestern Bell Long Distance's tariff. Rather, MITG seeks suspension of the tariff so that they may have a forum to seek discovery and engage in yet another "hearing for consideration of these issues"³— issues that are non-existent by virtue of Southwestern Bell Long Distance utilization of Feature Group D signaling.

4. As set forth in its First Amended Application, Southwestern Bell Long Distance will not provide Interexchange Telecommunications Services within Missouri, pursuant to the authority requested therein, either until authorized to provide in-region interLATA services by the FCC, pursuant to Section 271 of the 1996 Federal Telecommunications Act, or until otherwise permitted to do so by federal law. Accordingly, should neither of the above-stated prerequisites occur prior to the forty-five day effective date of Southwestern Bell Long Distance's tariff, Southwestern Bell

³Motion, page 3.

Long Distance will extend the effective date of said tariff as required, pursuant to 4 CSR 240-2.065(5). In summary, there are no allegations contained in the Motion of MITG that would warrant the suspension of the tariff of Southwestern Bell Long Distance, thereby delaying the increased competition and associated price and service options for telephone users in the state of Missouri.

WHEREFORE, Southwestern Bell Communications Services, Inc., d/b/a Southwestern Bell Long Distance respectfully prays that the Commission accept this Response to the Motion to Suspend filed by MITG, that said Motion be denied for the above-stated reasons, and that the relief requested in the First Amended Application of Southwestern Bell Long Distance, including approval of its tariff, be granted as expeditiously as possible.

Respectfully submitted,



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Distance

CERTIFICATE OF SERVICE

I do hereby certify that a true and correct copy of the foregoing Application has been hand-delivered or mailed, First Class mail, postage prepaid, this 26th day of March 2001, to:

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