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November 15, 2000

The Honorable Dale Hardy Roberts
Secretary/Chief Regulatory Law Judge
Missouri Public Service Commission
200 Madison Street, Suite 100
Jefferson City, MO 65102

FILED³
NOV 16 2000
Missouri Public
Service Commission

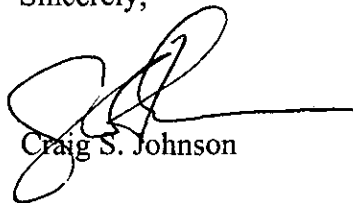
Re: Case NO: TO-2000-667

Dear Judge Roberts:

Enclosed for filing with the Missouri Public Service Commission in the above referenced case is an original and eight copies of MITG's Reply to Southwestern Bell's Response to MITG's Motion to Compel.

Thank you for seeing this filed.

Sincerely,


Craig S. Johnson

CSJ/bjn
Enclosure

BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI

FILED²
NOV 16 2000 js

Missouri Public
Service Commission

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

Case No. TO-2000-667

**MITG'S REPLY TO SOUTHWESTERN BELL'S
RESPONSE TO MOTION TO COMPEL**

The Commission's August 22, 2000 Order Recognizing Issues includes the Commission's conclusion that the issues raised by MITG and STCG were appropriately addressed in this case. Those issues included what records will be made for resold local plus, who will be responsible for delivery of those records, and what obligations does Southwestern Bell have to compensate other LEC's for resold local plus.

Southwestern Bell has unilaterally placed terminating local plus traffic on common trunk groups for termination to the small LEC's. Terminating local plus traffic, resold or otherwise, is there by-commingled with other traffic terminating to the small LEC's over these common trunk groups. The small LEC's receive inadequate call information on this traffic to separate one form of traffic from local plus traffic.

The data requested is relevant both in this case, as well as in TO-99-593. The fact that it is relevant to both proceedings makes them the proper subject matter for data request in this proceeding, regardless of whether or not the MITG is successful in obtaining equivalent information in TO-99-593. Because Southwestern Bell has placed terminating local plus traffic, including re-sold local plus, on the common trunk groups,

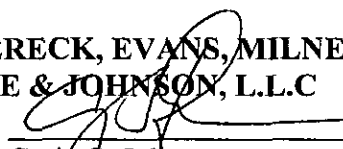
the nature, extent, and scope of translation errors committed by Southwestern Bell for traffic co-mingled on this trunk group is not beyond the scope of this case.

Southwestern Bell's complaint about the extent of work to which will be required to answer these data request is not persuasive. In light of the tremendous number of local plus subscribers, the tremendous amounts of traffic Southwestern Bell places upon this network, and the fact that it is Southwestern Bell's translation errors for which the data request are designed to ascertain and verify, the cause for these data request is of Southwestern Bell's own making.

Wherefore, on the basis of the foregoing, MITG again requests that Southwestern Bell be directed to answer the contested data requests.

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

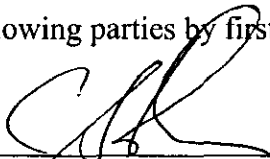
By


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CERTIFICATE OF SERVICE

Copies of this document were served on the following parties by first-class,
postage prepaid, U.S. Mail on November 15, 2000.



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