

**BEFORE THE PUBLIC SERVICE COMMISSION  
OF THE STATE OF MISSOURI**

Petition of MCImetro Access Transmission Services,	)	
L.L.C. d/b/a Verizon Access Transmission Services	)	
for Arbitration of an Interconnection Agreement with	)	<b>Case No. TO-2008-0037</b>
Embarq Missouri, Inc. d/b/a Embarq Under Section	)	
252(b) of the Telecommunications Act of 1996	)	

**RESPONSE OF EMBARQ MISSOURI, INC.  
TO PETITION FOR ARBITRATION  
OF MCIMETRO ACCESS TRANSMISSION SERVICES LLC  
D/B/A VERIZON ACCESS TRANSMISSION SERVICES**

In response to the petition for arbitration filed by MCImetro Access Transmission Services LLC d/b/a Verizon Access Transmission Services (“Verizon Access”) Embarq Missouri, Inc. (“Embarq”) states as follows:

1. Embarq lacks sufficient information to form a belief as to the truth or the falsity of the allegations contained in paragraphs 1 and 3.
2. Admits the allegations of paragraphs 2, 4, 5, 6, 7, 8, and 9, except that Embarq denies that Verizon Access has fully and accurately described Embarq’s position on the two disputed issues.
3. There are two disputed issues. The first issue is: “What compensation should apply to virtual NXX traffic under the ICA?” Embarq’s position on Issue 1 is that access charges should apply to VNXX traffic. When an Embarq end user originates a call that utilizes a VNXX dialing arrangement, Embarq should receive originating access charges but should not pay Verizon Access terminating access or any other compensation.

4. The second disputed issue, Issue 2, is: “Where Verizon Access is not purchasing UNE loops or resold services from Embarq, should Embarq be permitted to charge Verizon Access a monthly charge for ‘maintenance and storage’ of customers’ basic directory listing information that is based on Embarq’s tariffed rate for maintaining and storing foreign directory listings?” Embarq’s position on Issue 2 is that Embarq should be permitted to charge Verizon Access a monthly recurring charge for the referenced directory listing service. That monthly recurring charge should be equivalent to Embarq’s tariffed charge of \$2.25 for a residential foreign listing.

5. There are no additional issues for which Embarq seeks resolution herein.

6. Embarq agrees with the proposed interconnection agreement (“ICA”) that Verizon Access has attached to its position as Attachment C. Accordingly, Embarq has not attached another copy of the ICA to its response.

7. All correspondence, pleadings, orders, decisions, and communications regarding this proceeding should be sent to:

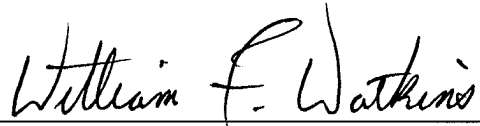
William F. Watkins  
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8. Attached to this response, marked “Attachment A” is a brief statement of Embarq’s position on the two disputed issues.

Embarq respectfully requests that the Commission arbitrate the two disputed issues, adopt contract language consistent with Embarq's position on both issues, and order the parties to execute an interconnection agreement including that language on the disputed issues and the other language that the parties have agreed upon.

Respectfully submitted,

A handwritten signature in black ink that reads "William F. Watkins". The signature is written in a cursive style with a horizontal line underneath it.

William Watkins      MO Bar No. 36112  
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**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that a copy of the above and foregoing was served on the following parties by electronic mail, this 5th day of September 2007.

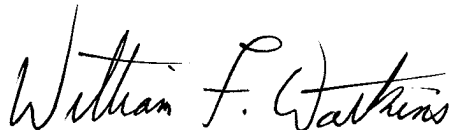
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