



October 4, 1999

The Honorable Dale Hardy Roberts
Secretary/Chief Regulatory Law Judge
Missouri Public Service Commission
301 West High Street, Floor 5A
Jefferson City, Missouri 65101

FILED²

OCT 4 1999

Missouri Public
Service Commission

Re: Case No. TT-99-428, et al.

Dear Judge Roberts:

Enclosed for filing with the Missouri Public Service Commission in the above-referenced case is an original and 14 copies of Southwestern Bell Wireless's Statement Of Position.

Thank you for bringing this matter to the attention of the Commission.

Very truly yours,

Jeanne A. Fischer /TM

Jeanne A. Fischer

Enclosure

cc: Attorneys of Record

FILED²

BEFORE THE PUBLIC SERVICE COMMISSION OCT 4 1999
OF THE STATE OF MISSOURI

Missouri Public
Service Commission

In the Matter of Alma Telephone Company's Filing to)
Revise its Access Service Tariff, PSC Mo. No. 2.)

Case No. TT-99-428, et al.

**SOUTHWESTERN BELL WIRELESS'S
STATEMENT OF POSITION**

Pursuant to the Missouri Public Service Commission's August 10, 1999 Order Establishing Procedural Schedule,¹ Southwestern Bell Wireless respectfully submits its Statement of Position:

1. Is the tariff proposed by MMG lawful as applied to wireless or CLEC traffic?

SWBW POSITION: No. The tariff change proposed by MMG is not lawful as applied to wireless traffic. By law, negotiated, reciprocal compensation rates apply to the exchange of traffic with wireless carriers, where such traffic originates and terminates within the same Major Trading Area (intraMTA traffic). The tariff change proposed by MMG is unlawful because it would apply access charges to intraMTA traffic exchanged with wireless carriers.

SWBW does not take a position of the issue of whether the tariff proposed by MMG is lawful as applied to CLEC traffic.

2. If lawful, should the tariff proposed by MMG be approved?

SWBW POSITION: The Commission should reject MMG's proposed tariff change on the basis that it is not lawful.

¹ In the Matter of Alma Telephone Company's Filing to Revise its Access Service Tariff, P.S.C. Mo.-No. 2, et al., Case Nos. TT-99-428, et al, Order Consolidating For All Purposes, Order Establishing Procedural Schedule, and Order Granting Suspension of Tariffs, issued August 10, 1999, at p. 4.

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Respectfully submitted,

SOUTHWESTERN BELL WIRELESS, INC.

BY Jeanne A. Fischer /tm

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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 October 4, 1999.

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