

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

In the Matter of the Investigation of the     )  
State of Competition in the Exchanges of     )  
Sprint Missouri, Inc.                             )

Case No. IO-2003-0281

**AT&T COMMUNICATIONS OF THE SOUTHWEST INC'S  
STATEMENT OF POSITION**

COMES NOW AT&T Communications of the Southwest, Inc. ("AT&T") and states:

1. On March 26, 2003, the Missouri Public Service Commission issued an Order Directing Procedural Schedule, which, *inter alia*, directed the filing of a list of issues by June 27, 2003, and the filing of statements of position by July 9, 2003.

2. On June 27, 2003, the Staff filed, on behalf of the parties, an agreed upon list of issues.

3. On July 7, 2003, AT&T filed a Motion to Withdraw from the proceeding based upon Sprint's Surrebuttal Testimony which stated that Sprint was no longer seeking competitive classification of its special access services. However, since the Commission has not yet had the opportunity to act on AT&T's Motion, AT&T provides the following statement of its position on the issues:

**Issue 1:** Section 392.245.5 RSMo allows the Commission to classify services of a Price Cap Company as competitive. Sprint Missouri, Inc., a Price Cap Company, has requested that its residence core access line services (i.e., local exchange service, local operating service, directory listing, extension service, extended area service, local measured service and PBX service) offered in the Kearney, Norborne, Rolla, Platte City and St. Robert exchanges be classified as competitive. In which of these Sprint Missouri, Inc. exchanges, if any, should Sprint's residence core access line services be classified as competitive?

Answer:

AT&T takes no position on this issue.

**Issue 2:**

Section 392.245.5 RSMo allows the Commission to classify services of a Price Cap Company as competitive. Sprint Missouri, Inc., a Price Cap Company, has requested that its residence access line-related services (i.e., Sprint Solutions, busy line verification service, customer calling services, express touch, network service packages) offered in the Kearney, Norborne, Rolla, Platte City and St. Robert exchanges be classified as competitive. In which of these Sprint Missouri, Inc. exchanges, if any, should Sprint's residence access line-related services be classified as competitive?

Answer:

AT&T takes no position on this issue.

**Issue 3:**

Section 392.245.5 RSMo allows the Commission to classify services of a Price Cap Company as competitive. Sprint Missouri, Inc., a Price Cap Company, has requested that its business core access line services (i.e., local exchange service, local operating service, directory listing, extension service, extended area service, local measured service and PBX service) offered in the Kearney, Norborne, Rolla, Platte City and St. Robert exchanges be classified as competitive. In which of these Sprint Missouri, Inc. exchanges, if any, should Sprint's business core access line services be classified as competitive?

Answer:

AT&T takes no position on this issue.

**Issue 4:**

Section 392.245.5 RSMo allows the Commission to classify services of a Price Cap Company as competitive. Sprint Missouri, Inc., a Price Cap Company, has requested that its business access line-related services (i.e. Sprint Solutions, busy line verification service, customer calling services, express touch, network service packages) offered in the Kearney, Norborne, Rolla, Platte City and St. Robert exchanges be classified as competitive. In which of these Sprint Missouri, Inc. exchanges, if any, should Sprint's business access line-related services be classified as competitive?

Answer:

AT&T takes no position on this issue.

**Issue 5:**

Section 392.245.5 RSMo allows the Commission to classify services of a Price Cap Company as competitive. Sprint Missouri, Inc., a Price Cap Company, has requested that its high capacity exchange access line services be classified as competitive. In which Sprint Missouri, Inc. exchanges, if any, should Sprint's high capacity exchange access line services be classified as competitive?

Answer:

AT&T takes no position on this issue

**Issue 6:**

Section 392.245.5 RSMo allows the Commission to classify services of a Price Cap Company as competitive. Sprint Missouri, Inc., a Price Cap Company, has requested that its CENTREX services be classified as competitive. In which Sprint Missouri, Inc. exchanges, if any, should Sprint's CENTREX services be classified as competitive?

Answer:

AT&T takes no position on this issue

**Issue 7:**

Section 392.245.5 RSMo allows the Commission to classify services of a Price Cap Company as competitive. Sprint Missouri, Inc., a Price Cap Company, has requested that its intraLATA private line services be classified as competitive. In which Sprint Missouri, Inc. exchanges, if any, should Sprint's intraLATA private line services be classified as competitive?

Answer:

AT&T takes no position on this issue

**Issue 8:**

Section 392.245.5 RSMo allows the Commission to classify services of a Price Cap Company as competitive. Sprint Missouri, Inc., a Price Cap Company, has requested that its ATM and Frame Relay services be classified as competitive. In which Sprint Missouri, Inc. exchanges, if any, should Sprint's ATM and Frame Relay services be classified as competitive?

Answer:

AT&T takes no position on this issue

**Issue 9:**

Section 392.245.5 RSMo allows the Commission to classify services of Price Cap Company as competitive. Sprint Missouri, Inc., a Price Cap Company, has requested that its special access services be classified as competitive. In which Sprint Missouri, Inc. exchanges, if any, should Sprint's special access services be classified as competitive?

Answer:

AT&T does not believe that Sprint's special access services should be classified as competitive in any Sprint exchange. However, Sprint is no longer seeking competitive classification for any special access service. (Idoux Surrebuttal, page 2).

**Issue 10:** Section 392.245.5 RSMo allows the Commission to classify services of a Price Cap Company as competitive. Sprint Missouri, Inc., a Price Cap Company, has requested that its intraLATA MTS services be classified as competitive. In which Sprint Missouri, Inc. exchanges, if any, should Sprint's intraLATA MTS services be classified as competitive?

Answer:

AT&T takes no position on this issue.

**Issue 11:** Section 392.245.5 RSMo allows the Commission to classify services of a Price Cap Company as competitive. Sprint Missouri, Inc., a Price Cap Company, has requested that its intraLATA WATS services and 800 services be classified as competitive. In which Sprint Missouri, Inc. exchanges, if any, should Sprint's intraLATA WATS services and 800 services be classified as competitive?

Answer:

AT&T takes no position on this issue.

**Issue 12:** Section 392.245.5 RSMo allows the Commission to classify services of a Price Cap Company as competitive. Sprint Missouri, Inc., a Price Cap Company, has requested that its Line Information Data Base Access (LIDB) services be classified as competitive. In which Sprint Missouri, Inc. exchanges, if any, should Sprint's LIDB services be classified as competitive?

Answer:

AT&T takes no position on this issue.

**Issue 13:** Section 392.245.5 RSMo allows the Commission to classify services of a Price Cap Company as competitive. Sprint Missouri, Inc., a Price Cap Company, has requested that its Speed Dial services be classified as competitive. In which Sprint Missouri, Inc. exchanges, if any, should Sprint's Speed Dial services be classified as competitive?

Answer:

AT&T takes no position on this issue.

**Issue 14:** Section 392.245.5 RSMo allows the Commission to classify services of a Price Cap Company as competitive. Sprint Missouri, Inc., a Price Cap Company, has requested that its Payphone services offered in the Kearney, Norborne, Rolla, Platte City and St. Robert exchanges be classified as competitive. In which of these Sprint Missouri, Inc. exchanges, if any, should Sprint's Payphone services be classified as competitive?

Answer:

AT&T takes no position on this issue.

**Issue 15:** Section 392.245.5 RSMo allows the Commission to classify services of a Price Cap Company as competitive. Sprint Missouri, Inc., a Price Cap Company, has requested that its Directory Assistance services be classified as competitive. In which Sprint Missouri, Inc. exchanges, if any, should Sprint's Directory Assistance services be classified as competitive?

Answer:

AT&T takes no position on this issue

**Issue 16:** Section 392.245.5 RSMo allows the Commission to classify services of a Price Cap Company as competitive. Sprint Missouri, Inc., a Price Cap Company, has requested that its Local Operator services be classified as competitive. In which Sprint Missouri, Inc. exchanges, if any, should Sprint's Local Operator services be classified as competitive?

Answer:

AT&T takes no position on this issue.

**Issue 17:** Section 392.245.5 RSMo allows the Commission to classify services of a Price Cap Company as competitive. Sprint Missouri, Inc., a Price Cap Company, has requested that its ISDN services offered in the Kearney, Norborne, Rolla, Platte City and St. Robert exchanges be classified as competitive. In which of these Sprint Missouri, Inc. exchanges, if any, should Sprint's ISDN services be classified as competitive?

Answer:

AT&T takes no position on this issue.

**Issue 18:** Section 392.245.5 RSMo allows the Commission to classify services of a Price Cap Company as competitive. Sprint Missouri, Inc., a Price Cap Company, has requested that its Optional MCA services offered in the Kearney exchange be classified as competitive. Should Sprint's Optional MCA services be classified as competitive in that Sprint Missouri, Inc. exchange?

Answer:

AT&T takes no position on this issue.

**Issue 19:** In absence of a request by Sprint Missouri, Inc. for the reclassification of a service in an exchange pursuant to Section 392.245.5, RSMo from price cap regulation to competitive status, should the Commission make a finding that

effective competition does not exist and order that the current price cap regulation continue to apply?

Answer:

AT&T takes no position on this issue.

**Issue 20:**

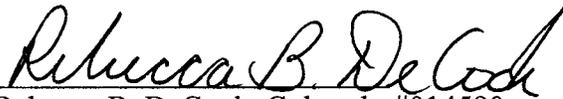
Section 392.245.5, RSMo provides that the Commission shall investigate the state of competition in Sprint's exchanges within five years of an alternative local exchange telecommunications company first being certified. of Missouri Inc.'s certification was effective on December 15, 1998. If the Commission does not issue a decision in this case by December 15, 2003, will any of Sprint Missouri Inc.'s telecommunications services in any Sprint Missouri, Inc. exchange be automatically reclassified or reclassified by default from price cap regulation to a competitive status?

Answer:

AT&T takes no position on this issue.

Dated July 9, 2003.

Respectfully submitted,



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**ATTORNEYS FOR AT&T COMMUNICATIONS  
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**CERTIFICATE OF SERVICE**

I certify that copies of AT&T Communications of the Southwest, Inc.'s Statement of Position were served on the following by e-mail on July 9, 2003.



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