

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

In the Matter of Southwestern Bell)
Telephone, L.P., d/b/a AT&T Missouri's)
IntraLATA Long Distance Dialing Parity)
Plan.)

Case No. TO-99-535

**STAFF RESPONSE IN OPPOSITION TO
MOTION FOR EXPEDITED TREATMENT**

COMES NOW the Staff of the Missouri Public Service Commission and for its response states:

1. On October 4, 2007, Southwestern Bell Telephone Company, d/b/a AT&T Missouri, filed a motion requesting that the Commission approve a modification of the intraLATA Toll Dialing Plan (ILDTP). AT&T Missouri requests elimination of the intraLATA equal access scripting requirement. In addition, AT&T requested that the Commission makes its decision in this matter no later than October 31, 2007.

2. On October 11, 2007, the Commission directed the Staff to respond no later than October 15 to AT&T Missouri's motion for expedited treatment.

3. Commission rule 4 CSR 240-2.080(16) provides:

(16) Any party seeking expedited treatment in any case shall include in the title of the pleading the words "Motion for Expedited Treatment." The pleading shall also set out with particularity the following:

(A) The date by which the party desires the commission to act;

(B) The harm that will be avoided, or the benefit that will accrue, including a statement of the negative effect, or that there will be no negative effect, on the party's customers or the general public, if the commission acts by the date desired by the party; and

(C) That the pleading was filed as soon as it could have been or an explanation why it was not.

4. First, as noted above, AT&T Missouri's motion requests the Commission approve the proposed modification of its ILDP no later than October 31, 2007.

Second, AT&T Missouri's motion asks the Commission to assume that AT&T Missouri's perception of the harm to be avoided and the benefit to be accrued by eliminating the intraLATA equal access scripting requirement justify expedited treatment of its proposal. Granting expedited treatment will inhibit the ability of the Commission and the Staff to analyze AT&T Missouri's perception of the harm to be avoided and the benefit to be accrued by its proposal.

Third, it does not appear that the motion was filed as soon as it could have been. AT&T Missouri asks the Commission to approve the proposed modification of its ILDP in order to remain consistent with an FCC order issued on August 31, 2007. AT&T Missouri waited a month to file its motion. One could speculate that AT&T Missouri would have needed some time to gauge whether customer frustration - - the harm to be avoided by elimination of the intraLATA scripting requirement - - would in fact result from continuing the intraLATA scripting requirement. Instead, AT&T Missouri's motion speculates that customer frustration "may" arise.

WHEREFORE, the Staff requests the Commission deny AT&T Missouri's motion for expedited treatment.

Respectfully submitted,

/s/ William K. Haas

William K. Haas

Deputy General Counsel

Missouri Bar No. 28701

Attorney for the Staff of the

Missouri Public Service Commission

P. O. Box 360

Jefferson City, MO 65102

(573) 751-7510 (Telephone)

(573) 751-9285 (Fax)

william.haas@psc.mo.gov

CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing have been mailed, hand-delivered, transmitted by facsimile or electronically mailed to all counsel of record this 15th day of October 2007.

/s/ William K. Haas

William K. Haas