GREENSFELDER
ATTORNEYS AT LAW

Greensfelder, Hemker & Gale, PC
2000 Equitable Building
10 South Broadway
St. Louis, MO 63102

T: 314-241-9090
F: 314-241-8624
www.greensfelder.com

Affiliate Office:
Greensfelder, Hemker & Gale
12 Wolf Creek Drive, Ste. 100
Belleville (Swansea), IL 62226

Jason L. Ross
St. Louis Office
Direct Dial (314) 345-4754
Direct Fax (314) 345-4704
e-mail jlr@greensfelder.com

December 12, 2002

VIA FEDERAL EXPRESS

FILED
DEC 13 2002
Missouri Public
Service Commission

Missouri Public Service Commission
Attn: Secretary of the Commission
200 Madison Street, Suite 100
Jefferson City, MO 65102-0360

Re: TR-2001-65

Dear Mr. Roberts,

Enclosed for filing with the Commission in the above-referenced case is an original and eight (8) copies of Initial Brief of Fidelity Communication Services I, Inc., Fidelity Communication Services II, Inc., Fidelity Communication Services III, Inc. and Fidelity Cablevision, Inc.

Please stamp "Filed" on the extra copy and return it to me in the enclosed self-addressed envelope.

Thank you for your assistance.

Yours very truly,

GREENSFELDER, HEMKER & GALE, P.C.

By Jason Ross
Jason L. Ross

JLR/kka
Enclosures
582799.1

cc: Office of the Public Counsel
Office of the General Counsel
Mr. John T. Davis
Mr. Dave Beier

GREENSFELDER
ATTORNEYS AT LAW

Greensfelder, Hemker & Gale, PC
2000 Equitable Building
10 South Broadway
St. Louis, MO 63102

T: 314-241-9090
F: 314-241-8624
www.greensfelder.com

Affiliate Office:
Greensfelder, Hemker & Gale
12 Wolf Creek Drive, Ste. 100
Belleville (Swansea), IL 62226

Jason L. Ross
St. Louis Office
Direct Dial (314) 345-4754
Direct Fax (314) 345-4704
e-mail jlr@greensfelder.com

December 12, 2002

TO: UNREPRESENTED PARTIES IN CASE NO. TR-2001-65:

Pursuant to the Missouri Public Service Commission's March 14, 2002, Order Adopting Procedural Schedule, Clarifying The Scope of This Proceeding, and Concerning Motion to Waive Service Requirement and Motion to Compel Discovery, Fidelity Communication Services I, Inc., Fidelity Communication Services II, Inc., Fidelity Communication Services III, Inc., and Fidelity Cablevision, Inc. hereby notify parties not represented by counsel that they have filed their Initial Brief. Any unrepresented party may obtain a copy of this pleading upon request at no cost.

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

Yours very truly,

GREENSFELDER, HEMKER & GALE, P.C.

By Jason Ross
Jason L. Ross

JLR/kka
582797.1

BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI

In the Matter of an Investigation of the Actual Costs Incurred in Providing Exchange Access Service and the Access Rates to be Charged by Competitive Local Exchange Telecommunications Companies in the State of Missouri	))))))	Case No. TR-2001-65

INITIAL BRIEF OF FIDELITY COMMUNICATION SERVICES I, INC., FIDELITY COMMUNICATION SERVICES II, INC., FIDELITY COMMUNICATION SERVICES III, INC., AND FIDELITY CABLEVISION, INC.

COME NOW Fidelity Communication Services I, Inc., Fidelity Communication Services II, Inc., Fidelity Communication Services III, Inc., and Fidelity Cablevision, Inc. (collectively, the "Fidelity CLECs") and for their Initial Brief in this case, state as follows:

INTRODUCTION

The Commission initiated this proceeding to "investigate all of the issues affecting exchange access service, including particularly the actual costs incurred in providing such service, in order to establish a long-term solution which will result in just and reasonable rates."[1] In response to the Commission's mandate to investigate actual costs, Commission Staff and its consultant, Ben Johnson and Associates, have gathered and analyzed cost data from carriers in this state, principally ILECs, and have developed and applied cost methodologies and assumptions to such data in an effort to determine actual costs. Similarly, many ILECs and IXCs participating in this proceeding have presented their own, competing assumptions and methodologies to the determine costs of providing switched access. Although the primary

[1] *In the Matter of an Investigation of the Actual Costs Incurred in Providing Exchange Access Service*, Case No. TR-2001-65 (Order Establishing Case, issued August 8, 2000) at p. 1; See also *In the Matter of an Investigation of the Actual Costs Incurred in Providing Exchange Access Service*, Case No. TR-2001-65 (Order Granting Clarification, issued December 12, 2000) at p. 2, and *In the Matter of an Investigation of the Actual Costs Incurred in Providing Exchange Access Service*, Case No. TR-2001-65 (Order Adopting Procedural Schedule, Clarifying the Scope of this Proceeding, and Concerning Motion to Waive Service Requirement and Motion to Compel Discovery , issued March 14, 2002) at p. 5.

purpose of this proceeding is to investigate—or to gather, compile and analyze data—the Commission has indicated that the information gathered in this proceeding will serve as a basis for subsequent "access reform" proceedings.[2]

Given the emphasis on ILEC rates in this proceeding, and the fact that the Fidelity CLECs are the only CLECs participating in this case that operate predominantly in rural areas, the Fidelity CLECs fear that they may be a lone voice in the wind. The Fidelity CLECs maintain that the access rates charged by CLECs need not be cost-based, and that, in any event, the cost data gathered by Commission Staff offers very little, if any, probative value with respect to the evaluation of the costs incurred by facilities-based CLECs in providing intrastate switched access in rural areas of the state. Further, the Fidelity CLECs believe that the cost data and methodologies offered by Commission Staff and the parties should not be viewed in a vacuum, but rather should be viewed in the context of the policies that shape existing rates. Accordingly, as more particularly described below, any decision based on the cost information gathered in this case should acknowledge the interplay between access rates and other rates, and should promote competition and regulatory flexibility.

ARGUMENT

1. *What is the appropriate cost methodology (i.e., TSLRIC, LRIC, embedded, stand alone, etc.) to be used in determining the cost of switched access?*

This Commission should not start from the premise that CLEC intrastate switched access rates must be cost-justified, or determined using any particular cost methodology. This proceeding was established principally to address the issue of whether the existing cap on CLEC

[2] *In the Matter of an Investigation of the Actual Costs Incurred in Providing Exchange Access Service*, Case No. TR-2001-65 (Order Adopting Procedural Schedule, Clarifying the Scope of this Proceeding, and Concerning Motion to Waive Service Requirement and Motion to Compel Discovery , issued March 14, 2002) at 5; *In the Matter of an Investigation of the Actual Costs Incurred in Providing Exchange Access Service*, Case No. TR-2001-65, Hearing Transcript, p. 1243, ll. 11-23.

access rates, adopted in Case No. TO-99-596, serves as an appropriate solution to what amounts to a market-based problem—the fact that LECs providing service to an end user enjoy a locational monopoly over the originating and terminating access markets.[3] The Commission should resist the urge to try to fix a market-based problem with a regulatory solution. It is premature for the Commission to adopt rigid rules governing CLEC rates when competition in this state is still in its infancy.

The Commission initiated this proceeding in part to develop a record containing detailed evidence concerning the actual costs incurred in providing exchange access service.[4] While several parties may debate whether such a record has actually been created, and what all of the evidence means, the Fidelity CLECs maintain that, at least as far as their intrastate access rates are concerned, the Commission need not, at this time, adopt any cost methodology to determine actual costs. The Commission should take an approach similar to that taken by the FCC, which has held that, in determining whether access rates charged by a CLEC are unjust and unreasonable, one must examine marketplace data—including the rates charged by the CLEC and others for services using comparable network functions—rather than the CLEC's actual costs of providing access services.[5] The FCC has based its decision on policies intended to promote competition. First, the FCC interprets the Telecommunications Act of 1996 as directing it to refrain, whenever possible, from applying to CLECs the "legacy, cost-based regulations long applicable to the access services of ILECs" and to instead rely on a "market-based approach."[6] Secondly, given that CLECs are not subject to the accounting and separations rules

---

[3] *In the Matter of an Investigation of the Actual Costs Incurred in Providing Exchange Access Service*, Case No. TR-2001-65 (Order Establishing Case and Adopting Protective Order, issued August 8, 2000) at 1.
[4] *Id.*
[5] *In the Matters of AT&T Corp., v. Business Telecom, Inc., Sprint Communications Company, L. P. v. Business Telecom, Inc.*, EB-01-MD-001, EB-01-MD-002, Memorandum Opinion and Order, FCC 01-185, ¶¶ 17-30 (released May 30, 2001).
[6] *Id.* at ¶ 18. (citations omitted).

applicable to ILECs, the FCC acknowledges that there would be substantial "legal and practical difficulties involved with comparing CLEC rates to any objective (i.e., cost-based) standard of reasonableness."[7] Finally, the FCC indicates that precedent exists for examining the reasonableness of rates by means other than reviewing the costs of an individual CLEC (i.e., by looking at the rates charged by the competing ILEC).[8]

In addition to reasonable prices and the protection of ratepayers, the purpose of Chapter 392, RSMo, is to "[p]ermit flexible regulation of competitive telecommunications companies and competitive telecommunications services[.]"[9] Additionally, Section 392.200.4(2), RSMo Supp. 2000, declares that "[i]t is the intent of this act to bring the benefits of competition to all customers[.]" These provisions justify CLEC access rates being regulated to a lesser degree than ILEC rates. Further, as a practical matter, CLECs are not required to abide by the same accounting and separations rules as ILECs, and, accordingly, simply lack the access cost data required to be meaningful subjects of an "across-the-board" study. These practical difficulties, combined with the fact that CLEC access revenues pale in comparison to ILEC revenues, serve to explain why Commission Staff has, rightfully, spent the vast majority of its time evaluating ILEC cost data, and why the record is devoid of any meaningful data concerning CLEC costs. Like the FCC, this Commission should reject the urge to adopt any uniform cost methodology to determine CLEC costs, and should, instead rely on market factors (including the competing ILEC rates) to determine reasonable rates for intrastate access.

A rigid cap on CLEC rates is not necessary to protect the public interest. Admittedly, the access rates charged by the directly competing ILEC are relevant in determining the reasonableness of rates charged by CLECs, but should not be the sole consideration. Rather, as

[7] *Id.* at ¶ 19. (citations omitted).
[8] *Id.*

described below, rates below the cap should be conclusively presumed reasonable, while rates above the cap should be allowed except upon showing by the Commission or another carrier that the rate is unreasonable in light of marketplace data such as the rates charged by the CLEC and others for services using comparable network functions.

In the event that the Commission should determine that CLEC intrastate switched access rates must bear some relation to costs, the appropriate methodology to be used to determine the costs are the actual embedded, booked costs allocated to the intrastate exchange jurisdiction. The TSLRIC and stand-alone costs are relevant only in that they, respectively, establish a floor and a ceiling for access costs. Where rates fall between TSLRIC and stand-alone costs, the rates are "subsidy free," and policy considerations dictate how much support should flow to access from other services such as local.

2. Should the cost methodology (i.e., TSLRIC, LRIC, embedded, stand alone, etc.) for determining switched access costs be uniform and consistent for all Missouri LECs?

There is no reason to adopt a "one size fits all" approach in this proceeding. In fact, the FCC has adopted differing approaches for price-cap ILECs,[10] rate-of-return ILECs[11] and CLECs[12]. Further, as discussed above, there is no reason to adopt a cost methodology at all with respect to CLEC access rates, which need not be cost-based.

---

[9] Section 392.185(5), RSMo Supp. 2000.

[10] See *Access Charge Reform*, Sixth Report and Order, CC Dkt. Nos. 96-262 and 94-1, Report and Order in CC Dkt. No. 99-249, Eleventh Report and Order in CC Docket No. 96-45, 15 FCC Rcd 12962, 13026-13039, at ¶¶ 151-84 (2000) (adopting rate level components for price-cap carriers).

[11] See 47 C.F.R. §§ 65.1-65.830 (relating to rate of return that certain non-price-cap ILECs may earn on interstate access service).

[12] *In the Matter of Access Charge Reform, Reform of Access Charges Imposed by Competitive Local Exchange Carriers*, CC Dkt. 96-262, Seventh Report and Order and Further Notice of Proposed Rulemaking, FCC 01-146 (released April 27, 2001).

3. Should loop costs be included in the determination of the cost of switched access, and if so, at what level?

Loop and other shared facility costs should be included in the cost of switched access based on the relative use of each such facility to provide such service. Such facilities are necessary for a carrier to provide access.

4. Is the current capping mechanism for intrastate CLEC access rates appropriate and in the public interest?

In Case No. TO-99-596, the Commission concluded that the public interest was served by capping CLEC exchange access rates, on an exchange-by-exchange basis, at the level of the access rates charged by the directly competing ILEC.[13] A rigid cap on CLEC rates is not, however, necessary to protect the public interest. Admittedly, the access rates charged by the directly competing ILEC are relevant in determining the reasonableness of rates charged by CLECs, but should not be the only consideration. Rather, rates below the cap should be conclusively presumed reasonable, while rates above the cap should be allowed except upon showing by the Commission or another carrier that the rate is unreasonable in light of marketplace data such as the rates charged by the CLEC and others for services using comparable network functions.

Should the Commission, nevertheless, conclude that the current capping mechanism is necessary to protect the public interest, at a minimum, the cap should be used as a default, but rebuttable, presumption as to the reasonableness of the access rates charges by a particular CLEC. Further, the capping mechanism should be modified to include certain exemptions included in the "tariff benchmark mechanism" adopted by the Federal Communications

[13] *In the Matter of the Access Rates to be Charged by Competitive Local Exchange Telecommunications Companies in the State of Missouri*, Case No. TO-99-596 (*Report and Order*, issued June 1, 2000), at pp. 15-16.

Commission ("FCC"), which gradually decreases the interstate switched access rates charged by a CLEC to the rate charged by the competing ILEC.[14]

For example, the Commission should consider adopting a rural exemption, similar to that adopted by the FCC, which allows CLECs serving rural exchanges of large ILECs to charge the National Exchange Carrier Association ("NECA") interstate switched access rates rather than the competing ILECs' maximum rates.[15] While, at the state level, there is no corollary to the NECA tariffs filed with the FCC, the Commission should adopt the reasoning behind the FCC's rural exemption and allow CLECs serving rural areas to charge intrastate switched access rates equivalent to those charged by the small ILECs operating in this state. Further, the Commission should modify the current capping mechanism to allow every CLEC competing with a price cap ILEC to charge the *maximum* rate the ILEC is or has been permitted to charge. CLEC rates should not be capped at the rate the price cap ILEC is *actually* charging because the price cap ILECs' *maximum* rates are each presumed to be just, reasonable and lawful. If a CLEC is required to reduce its access rates every time the competing ILEC does, the ILEC can, in effect, control the CLEC's rate design and effect its economic well being. If a CLEC chooses to charge access rates in excess of the ILEC; it does so at its own risk and the marketplace may punish it, but that is the precise nature of competition.

---

[14] *In the Matter of Access Charge Reform, Reform of Access Charges Imposed by Competitive Local Exchange Carriers*, CC Dkt. 96-262, Seventh Report and Order and Further Notice of Proposed Rulemaking, FCC 01-146, ¶¶ 51-55 (released April 27, 2001).

[15] *In the Matter of Access Charge Reform, Reform of Access Charges Imposed by Competitive Local Exchange Carriers*, CC Dkt. 96-262, Seventh Report and Order and Further Notice of Proposed Rulemaking, FCC 01-146, ¶¶ 73, 76 and 80-81 (released April 27, 2001) (holding that a CLEC operating in a rural area—defined, generally, as a city of less than 50,000 inhabitants—may tariff rates at the level of those in the NECA access tariff, assuming the highest rate band for local switching and the transport interconnection charge, *minus* the tariff's carrier common line (CCL) charge if the competing ILEC is subject to the FCC's *CALLs Order*.)

5. ***Are there circumstances where a CLEC should not be bound by the cap on switched access rates?***

Should the Commission determine that CLEC rates need to be cost-based, the Commission should allow a CLEC to charge rates that exceed the prescribed cap unless there is a showing by the Commission or another carrier that the rate is unreasonable in light of marketplace data such as the rates charged by the CLEC and others for services using comparable network functions. In the event that the Commission determines that CLEC rates must be cost-based, the CLEC should be entitled charge rates exceeding the cap if it supplies a cost study or other appropriate data that demonstrates that its cost of providing switched access exceeds the capped rate, or where the competing ILEC receives revenues (i.e., from a universal service fund or through rate-rebalancing permitted under the price cap statute) that offset the cost of providing access, which revenues are not readily available to the CLEC.[16]

The Fidelity CLECs are particularly concerned that the cap on CLEC intrastate switched access rates may hamper the ability of CLECs to compete in the rural exchanges of the large incumbent ILECs. The capped rate may not adequately reflect the cost of providing switched access incurred by CLECs, in particular where said CLECs serve predominately rural areas or areas in which access rates have not been geographically deaveraged. Where CLECs are serving rural exchanges of large ILECs, the Commission should consider adoption of a rural exemption, similar to that adopted by the FCC, which would allow said CLECs to use intrastate switched access rates charged by rural ILECs in this state rather than the competing ILECs' maximum rates.

[16] *Id.* at ¶ 54 (in which the FCC held that by moving interstate switched access CLEC tariffs to the rates of the competing ILEC, CLECs should not be deprived of revenue streams available to the incumbent which they compete and should , for example, be permitted to receive revenues equivalent to those that the ILECs receive through the presubscribed interexchange carrier charge (PICC)).

An additional rationale for this position is that the trend seems to indicate that facilities-based CLECs are more viable. The cost, however, of creating new infrastructure means that a CLEC must expend large amounts of capital and replicate systems that have been put in place by incumbent LECs over many years, or the CLEC s cannot be competitive.

6. Whether the Commission has jurisdiction to direct a CLEC to reduce its switched access rates?

For the following reasons, the Commission has only limited jurisdiction to reduce CLEC access rates: (1) the capping mechanism approved by the Commission in Case No. TO-99-596 recognizes that the rates charged by a CLEC need not necessarily be cost-based; and (2) the Commission is prohibited from erecting barriers to entry.[17]

Generally, applicants requesting a certificate of service authority to provide competitive local exchange services within this state have requested and been granted a waiver of Section 392.240(1), RSMo Supp. 2000, which section allows the Commission, on its own motion or pursuant to a complaint, to determine the just and reasonable charges for transmission of messages or communications. Accordingly, the rates charged by CLECs are generally outside the jurisdiction of the Commission and may be based on market considerations rather than cost.[18] A cap on exchange access rates has, however, generally been imposed in each CLEC's certification case by agreement of the parties to the so-called "standard stipulation," and such stipulation has been approved, with some modifications, as an interim solution, in Case No. TO-99-596—based on the Commission's finding that originating and terminating access are "bottleneck" services.[19] As held in the Commission's prior decision, however, access rates for CLECs need only be reasonable, and the rates charged by the competing ILEC, having been

[17] 47 U.S.C. § 253.
[18] See also Sections 392.500 and 392.510, RSMo Supp. 2000.

reviewed and approved by the Commission, are presumed to be reasonable.[20] Further, the Commission has held that petitions filed by CLECs, proposing access rates higher than those of the directly competing ILEC, should be reviewed using a flexible standard, on a case-by-case basis. While costs are one important factor to be considered, Chapter 392, RSMo, mandates the consideration of other factors as well, including the desire for flexible regulation of competitive telecommunications companies and competitive telecommunications services.[21] In sum, based on the Commission's prior decision, as well as the waivers granted to CLECs, CLEC access rates below the competing ILEC rates are not subject to Commission jurisdiction and need not be cost-based. Further, cost is only one consideration for CLECs rates above the prescribed cap.

In addition, the Commission is barred from requiring CLECs to reduce access rates below the rates charged by the competing ILEC, as such would constitute an unlawful barrier to entry. If, for example, the Commission should find that it lacks the jurisdiction to lower the rates of the price cap companies, but has the jurisdiction to lower CLEC rates, it should, nevertheless, not take any action to reduce CLEC access rates below the rate of the competing ILEC, because such action would have the effect of prohibiting, on a non-competitively neutral basis, CLECs from providing intrastate telecommunications services, in violation of 47 U.S.C. § 253. At a minimum, CLECs must enjoy the same regulatory safe harbors as ILECs.

Finally, in no event should the Commission take any action at this stage of the proceeding to reduce CLEC access rates. The Commission initiated this proceeding as an "investigation," pursuant to its quasi-legislative authority, and it is premature to effect any change in rates at this time. Before the Commission could effect any change in CLEC access rates, due process

---

[19] *In the Matter of the Access Rates to be Charged by Competitive Local Exchange Telecommunications Companies in the State of Missouri*, Case No. TO-99-596 (*Report and Order*, issued June 1, 2000), at pp. 14-15, 17-18.
[20] *Id.* at p. 18.
[21] *Id.*; See also Section 392.185, RSMo Supp. 2000.

dictates that CLECs be granted notice and an opportunity to be heard. While the Fidelity CLECs believe that the Commission or the carrier challenging a CLEC's rates should bear the burden of proving that the rate is unreasonable, should the Commission conclude otherwise, at a minimum, CLECs should have the opportunity to present their own cost data or other appropriate information, because Commission Staff has almost exclusively concentrated on ILEC data in this proceeding.

7. Whether the Commission has jurisdiction to direct a CLEC to restructure its switched access rates?

As mentioned above, CLECs have generally requested, and been granted by the Commission, a waiver of Section 392.240(1), RSMo Supp. 2000. Accordingly, CLEC rates—at least for services other than access—need not be just or reasonable or supported by any cost data or methodology. Competitive services are priced based on market considerations and warrant a lesser degree of regulation. The Commission, for example, cannot force a CLEC to raise or lower its rates for local exchange service. Accordingly, even assuming that the Commission has the jurisdiction to reduce access rates, the Commission does not have the jurisdiction to require a CLEC to "rebalance" or "restructure" its rates for non-access services to offset or accommodate the reduction. At the same time, however, the Commission should not require a CLEC to reduce access rates, and restrict the CLEC from increasing other rates, or restructuring its services to offset the loss in revenues.

Dated: December 12, 2002

Respectfully submitted,

GREENSFELDER, HEMKER & GALE, P.C.

By: Jason Ross

Sheldon K. Stock, MBE No. 18581
sks@greensfelder.com
Jason L. Ross, MBE No. 51428
jlr@greensfelder.com
10 South Broadway, Ste. 2000
St. Louis, Missouri 63102-1774
(314) 241-9090
(314) 241-8624 (facsimile)

Attorneys for
Fidelity Communication Services I, Inc.,
Fidelity Communication Services II, Inc.,
Fidelity Communication Services III, Inc.,
and Fidelity Cablevision, Inc.

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing in Case No. TR-2001-65 was served upon all counsel of record on this 12th day of December, 2002 by either hand delivery or placing same in postage paid envelope and depositing in the U.S. Mail.

Jason Ross

Michael Dandino
Office of the Public Counsel
PO Box 7800
Jefferson City, MO 65102

Thomas R. Parker
GTE Midwest Inc. d/b/a Verizon
605 Monroe Street, Suite 304
Jefferson City, MO 65101

Mary Ann Garr Young
P.O. Box 104595
Jefferson City, MO 65110-4595

Paul Lane
Southwestern Bell Telephone Company
One SBC Center, Room 4300
St. Louis, MO 63101

Stephen F. Morris
MCI Telecommunications Corp.
701 Brazos, Suite 600
Austin, TX 78701

Paul H. Gardner
Goller, Gardner & Feather
131 East High Street
Jefferson City, MO 65101

James M. Fischer
Larry W. Dority
Fischer & Dority
101 Madison Street, Suite 400
Jefferson City, MO 65101

Rebecca B. DeCook
AT&T Communications of Southwest
1875 Lawrence Street, Suite 1575
Denver, CO 80202

Dan Joyce
General Counsel
P.O. Box 360
Jefferson City, MO 65102

Craig S. Johnson
Andereck/Evans/Milne, et al.
301 E. McCarty Street, P.O. Box 1438
Jefferson City, MO 65102

Brian T. McCartney
W.R. England, III
Brydon, Swearengen & England PC
312 E. Capitol Avenue, P.O. Box 456
Jefferson City, MO 65102-0456

Carl J. Lumley
Leland B. Curtis
Curtis, Oetting, Heinz, et al.
130 S. Bemiston, Suite 200
St. Louis, MO 63105

Carol Keith
Gabriel Communications of Missouri
16090 Swingley Ridge Road, Suite 500
Chesterfield, MO 63017

Ken Schifman
Sprint
6450 Spring Parkway
Mail Stop KSOPHN0212-2A303
Overland Park, KS 66251

J. Steve Weber
AT&T Communications of Southwest
101 W. McCarty, Suite 216
Jefferson City, MO 65101

Cathleen Martin
Newman, Comley and Ruth
601 Monroe Street, Suite 301
Jefferson City, MO 65102