

CURTIS, OETTING, HEINZ, GARRETT & O'KEEFE, P. C.

ATTORNEYS AT LAW

130 SOUTH BEMISTON, SUITE 200

ST. LOUIS, MISSOURI 63105

(314) 725-8788

FAX (314) 725-8789

CARL J. LUMLEY
PRINCIPAL

CLUMLEY@COHGS.COM

August 8, 2002

Secretary of the Commission
Missouri Public Service Commission
200 Madison Street, Suite 100
P.O. Box 360
Jefferson City, Missouri 65102-0360

Via Federal Express

833736654581

FILED³

AUG 09 2002

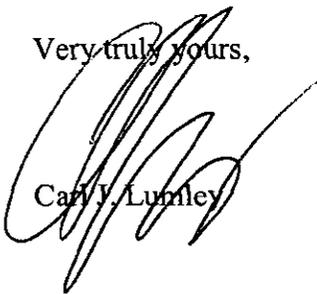
Re: Case No. TT-2002-472

Dear Secretary of the Commission:

Missouri Public
Service Commission

Enclosed please find for filing with you office an original and nine (9) copies of Proposed List of Issues on behalf of NuVox Communications of Missouri, Inc., MCImetro Access Transmission Services, LLC, Brooks Fiber Communications of Missouri, Inc., and MCI WorldCom Communications, Inc., in connection with the above-referenced proceeding. Upon your receipt, please process and return a file stamped copy of to the undersigned in the enclosed, self-addressed, stamped envelope. If you have any questions, please contact me.

Very truly yours,


Carl J. Lumley

CJL:dn
Enclosures
cc. Parties of Record (W/Enclosure)

AUG 09 2002

BEFORE THE MISSOURI PUBLIC SERVICE COMMISSION

Missouri Public Service Commission

In the Matter of Southwestern Bell)	
Telephone Company's Tariff to Initiate)	Case No. TT-2002-472
Residential Customer Winback Promotion)	Tariff No. 200200831

In the Matter of Southwestern Bell Telephone)	
Company's Tariff Filing to Extend Business)	Case No. TT-2002-473
Customer Winback Promotions.)	Tariff No. 200200828

PROPOSED LIST OF ISSUES

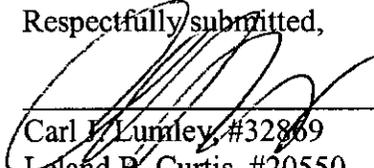
Come Now, NuVox Communications of Missouri, Inc., MCImetro Access Transmission Services, LLC, Brooks Fiber Communications of Missouri, Inc., and MCI WorldCom Communications, Inc. and, the parties being unable to agree, propose the following three issues to be included in the Statement of Issues in this proceeding:

1. Should the Commission approve SWBT's proposed revision to Local Exchange Tariff PSC Mo-24 to offer a waiver of Service and Equipment Charges to residential customers who have disconnected their access line with SWBT for the purpose of establishing service with another LEC within the SWBT service area and who now wish to return service with SWBT?

2. Should the Commission approve SWBT's proposed revision to Local Exchange Tariff PSC Mo-24, Sections 2 and 3 of the Integrated Services Tariff PSC Mo-41 and Section 38 of the General Exchange Tariff PSC Mo-35 to offer a waiver of Service and Equipment Charges to business customers who have disconnected their access line with SWBT for the purpose of establishing service with another LEC within the SWBT service area and who now wish to return service with SWBT?

3. Should the Commission commence an investigation regarding SWBT's winback and retention practices, including but not limited to SWBT's use of CPNI and wholesale disconnect information?

Respectfully submitted,



Carl F. Lumley, #32869

Leland B. Curtis, #20550

Curtis, Oetting, Heinz, Garrett & O'Keefe, P.C.

130 S. Bemiston, Suite 200

Clayton, Missouri 63105

(314) 725-8788

(314) 725-8789 (FAX)

clumley@cohgs.com

lcurtis@cohgs.com

Attorneys for NuVox Communications of Missouri, Inc., MCImetro Access Transmission Services, LLC, Brooks Fiber Communications of Missouri, Inc. and MCI WorldCom Communications, Inc.

Certificate of Service

A true and correct copy of the foregoing document was mailed this 8 day of August, 2002, by placing same in the U.S. Mail postage paid to the persons listed on the attached list.



Office of Public Counsel
P.O. Box 7800
Jefferson City, Missouri 65102

Paul G. Lane
General Attorney-Missouri
Southwestern Bell Telephone Company
One Bell Center, Room 3520
St. Louis, MO 63101-1976

Office of General Counsel
Missouri Public Service Commission
P.O. Box 360
Jefferson City, MO 65102

Rebecca DeCook
AT&T
1875 Lawrence Street, Suite 1575
Denver, CO 80202

Stephen F. Morris
WorldCom Communications
701 Brazos, Suite 600
Austin, TX 78701

Steve Weber
101 W. McCarty Street
Jefferson City, MO 65101