

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

In the Matter of the Request from the)	
Customers in the Rockaway Beach)	
Exchange for an Expanded Calling)	Case No. TO-2003-0257
Scope to Make Toll-Free Calls)	
to Branson.)	

**CENTURYTEL OF MISSOURI, LLC'S RESPONSE
TO ORDER DIRECTING FILING AND
MOTION TO RESCHEDULE CONFERENCE**

COMES NOW CenturyTel of Missouri, LLC ("CenturyTel"), pursuant to 4 CSR 240-2.080 and the Commission's *Order Directing Notice, Setting An Intervention Deadline, Scheduling A Conference, And Regarding The Filing Of Illustrative Tariff Sheets* issued herein on April 11, 2005 ("Order"), and for its Response and Motion to Reschedule Conference respectfully states as follows:

1. As reflected in the Commission's *Order*, this matter has evolved from the original filing by the Office of the Public Counsel ("OPC") of a petition requesting that customers in the Rockaway Beach exchange have toll-free calling into Branson, to OPC's Request for Expanded Calling Plan filed on February 24, 2005, whereby additional, contiguous exchanges would be included in a mandatory, two-way calling plan. CenturyTel filed its Response to OPC's latest plan on March 7, 2005. Thereafter, the Commission instructed OPC and Staff to clarify certain matters, and their responsive filings were made on March 28 and March 31, 2005, respectively.

2. The Commission's *Order* also noted that the OPC and CenturyTel disagreed with the Staff of the Commission as to what the next steps should be in this case, with the disputes including "whether or not an additional conference should be scheduled, and whether the Commission should suspend its requirement that the company file illustrative tariff sheets." While the Commission agreed with the Staff's position, it nonetheless stated that ". . . the Commission is willing to schedule another conference, as requested by Public Counsel, to facilitate the resolution of this matter." (*Order* at 2-3). As a result, the Commission scheduled a conference for May 2, 2005. On April 27, 2005, OPC filed a request to postpone the conference and, by the Commission's *Order Rescheduling Conference* issued on April 28, 2005, the conference was rescheduled to June 1, 2005. Finally, the Commission's April 11 *Order* also ordered CenturyTel to file illustrative tariff sheets, and supporting documentation if it proposes to increase or establish new rates designed to maintain revenue neutrality, including the recovery of any new costs associated with implementing the new proposal, no later than May 25, 2005.

3. The illustrative tariff sheets filing is referenced in the Metropolitan Calling Area/Calling Scope Task Force Final Report and in Subsection (12) of the Commission's Proposed Rule, 4 CSR 240-2.061. In addressing the Commission's previous request for clarification regarding whether the carriers' statements of revenue and expense impacts, and the revenue neutrality requirements related to the proposal are to be submitted to Staff or filed in the case papers, the Staff observed that "[t]he Task Force's recommended

procedure and the proposed rule are both silent on the details of the carrier's submission."¹ In recommending that the carriers' submissions be filed into the case, the Staff stated: "If any supporting documentation contains proprietary or confidential data, it should be designated accordingly and submitted to the parties pursuant to a protective order. The illustrative tariffs should not contain proprietary or confidential data and should be filed without a confidential or proprietary designation."²

4. Accordingly, CenturyTel respectfully submits as **Exhibit A** attached hereto a public version **illustrative tariff** that would reflect the applicant's proposal, including OPC's proposed rates, as submitted on February 24, 2005. CenturyTel does not support or propose such tariff, would object to its consideration and approval, and files it in response to the Commission's previous directive. Simultaneously herewith, CenturyTel respectfully submits as **Exhibit B HIGHLY CONFIDENTIAL ("HC")** supporting documentation that includes statements of revenue and expense impacts and revenue neutrality requirements related to the proposed plan. **Exhibit B HC** is filed pursuant to, and should be handled in accordance with, the Commission's Protective Order issued herein on May 19, 2005. **Exhibit B NP** is being filed with the public version of this pleading.

5. CenturyTel has advised the OPC and Staff that it would like to present and discuss alternative proposals designed to maintain revenue neutrality for the company, after those parties have had the opportunity to review

¹ Staff's Fourth Status Report, March 31, 2005, page 5.

² *Id.*, pages 5-6.

the confidential information submitted herewith. These discussions necessarily will involve confidential and competitively sensitive cost and pricing information. To provide a meaningful opportunity to review the confidential information, CenturyTel would respectfully request that the Commission reschedule the Conference now scheduled for June 1, 2005, to Thursday, June 16, 2005, beginning at 10:00 a.m. In addition, while the Commission's previous *Order* indicated that the conference would begin with a brief on-the-record session held in the Commission's offices, the Office of the Public Counsel has agreed to host and facilitate the conference on the June 16 date. As the OPC noted in its previous responsive pleading, the conference will allow the parties to identify and discuss possible solutions and/or impasses and, as the Commission's *Order* stated, "to facilitate the resolution of this matter." CenturyTel is authorized to state that both the OPC and the Staff support the request to reschedule the Conference to June 16, 2005, and that the Conference can be held at the offices of the OPC without going on-the-record, should the Commission agree with that suggested modification. The parties will advise the Commission of the status of this matter and any suggested additional proposals and/or procedures, on or before June 30, 2005.

WHEREFORE, CenturyTel of Missouri, LLC respectfully submits **Exhibit A and Exhibit B Highly Confidential** attached hereto in response to the Commission's *Order*, and moves the Commission to reschedule the Conference to June 16, 2005, as set forth above.

Respectfully submitted,

/s/ Larry W. Dority

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Certificate of Service

I hereby certify that the undersigned has caused a complete copy of the attached document to be electronically filed and served on the Commission's Office of General Counsel (at gencounsel@psc.mo.gov), the Office of Public Counsel (at opcservice@ded.mo.gov), on this 25th day of May 2005.

/s/ Larry W. Dority

Larry W. Dority