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January 3, 2001

FILED³

JAN 03 2001

Mr. Dale Hardy Roberts
Secretary/Chief Regulatory Law Judge
Missouri Public Service Commission
200 Madison Street, Suite 100
P.O. Box 360
Jefferson City, Missouri 65102

Missouri Public
Service Commission

Re: Case No. TO-2000-667
Southwestern Bell Telephone Company Local Plus® Service

Dear Mr. Roberts:

Please find enclosed for filing in the above-referenced case an original and eight (8) copies of the Statement of Position Of ALLTEL Communications, Inc. And Notice Of Substitution Of Witness. A copy of this filing has been sent this date to counsel for all parties of record. Thank you.

Sincerely,

Brent Stewart
Brent Stewart

CBS/bt

Enclosure

cc: Counsel for all parties of record
Suzanne McCormick

BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI

FILED³
JAN 03 2001

Missouri Public
Service Commission

In the Matter of the Investigation into the)
Effective Availability for Resale of)
Southwestern Bell Telephone Company's) Case No. TO-2000-667
Local Plus Service by Interexchange)
Companies and Facilities-Based)
Competitive Local Exchange Companies.)

STATEMENT OF POSITION OF ALLTEL COMMUNICATIONS, INC.
AND
NOTICE OF SUBSTITUTION OF WITNESS

COMES NOW Intervenor ALLTEL Communications, Inc. ("ACI"), pursuant to the Commission's September 7, 2000 Order Adopting Procedural Schedule, and for its Statement of Position and Notice of Substitution of Witness, respectfully states as follows:

I. STATEMENT OF POSITION

1. *Is Southwestern Bell Telephone Company ("SWBT") properly making Local Plus[®] service available for resale to IXC's and CLECs?*

No. SWBT currently refuses to make Local Plus[®] service available for resale to facilities-based CLECs, such as ACI, who desire to provide resold Local Plus[®] service through use of the CLEC's own switch on a non-unbundled network element ("UNE") basis.

2. *Who should be responsible for paying terminating access charges to third party LECs when:*

a. Local Plus[®] is being offered through pure resale of SWBT's retail Local Plus[®] offering?

ACI agrees with the Staff, the Missouri Independent Telephone Group ("MITG"), and the Small Telephone Company Group ("STCG") that payment of terminating access charges to third party LECs is appropriate and that SWBT should be responsible for payment of same when SWBT's Local Plus® service is being provided to end users on a pure resold basis.

b. Local Plus® is being offered through a facility-based carrier's purchase of unbundled switching from SWBT?

ACI agrees with the Staff, the MITG, and the STCG that payment of terminating access charges to third party LECs is appropriate and that SWBT should be responsible for payment of same when SWBT's Local Plus® service is being provided to end users through a facility-based carrier's purchase of UNEs from SWBT.

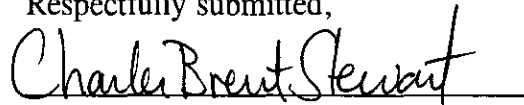
c. Local Plus® is being offered through a facility-based carrier's own switch?

ACI agrees with the Staff, the MITG, and the STCG that payment of terminating access charges to third party LECs is appropriate and that SWBT should be responsible for payment of same when SWBT's Local Plus® service is being provided to end users by way of the facility-based CLEC's own switch. Competitors of SWBT should only be responsible for paying SWBT the service's discounted recurring rate which has been set by the Commission. To insure third party LECs receive appropriate compensation from SWBT for terminating access, a CLEC's switch can make the necessary translation changes and send the call to SWBT for transport to its destination. Settlement records created on the CLEC's switch can be forwarded to SWBT for delivery to any non-SWBT LEC to which a resold Local Plus® call terminates.

II. NOTICE OF SUBSTITUTION OF WITNESS

As indicated in the parties' joint filing of the *Proposed List Of Issues, Order Of Witnesses, And Order Of Cross-Examination* on December 20, 2000, ACI witness Mr. Jack Redfern passed away on December 18, 2000. Mr. Larry Krajci, Staff Manager of State Government Affairs for ACI, will be adopting Mr. Redfern's previously filed rebuttal and surrebuttal testimony at the hearing.

Respectfully submitted,



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ATTORNEY FOR ALLTEL
COMMUNICATIONS, INC.

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true copy of the foregoing was sent to counsel for all parties of record in Case No. TO-2000-667 by depositing same in the United States Mail, first class postage prepaid, or by hand-delivery, this 3rd day of January, 2001.

