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FILED²

SEP 03 2002

Missouri Public
Service Commission

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

RE: *In the Matter of the 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

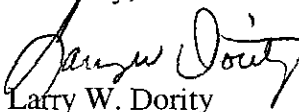
Mr. Roberts:

Enclosed for filing in the above-referenced matter is the original of ALLTEL Missouri, Inc.'s Statement of Positions.

Pursuant to the Commission's Order Adopting Procedural Schedule, Clarifying the Scope of this Proceeding, and Concerning Motion to Waive Service Requirement and Motion to Compel Discovery issued on March 14, 2002, a copy of ALLTEL Missouri, Inc.'s Statement of Positions and this cover letter will be served, **via E-Mail**, this date on counsel for all represented parties to the case. A copy of this cover letter will be served this date on all unrepresented parties who may request a copy of ALLTEL Missouri, Inc.'s Statement of Positions, at no cost.

Thank you for your attention to this matter.

Sincerely,


Larry W. DORITY

/jr

Enclosures

cc: Counsel for All Represented Parties of Record w/attachment, **via E-Mail**
All Unrepresented Parties of Record w/o attachment

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

FILED²
SEP 03 2002

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

Missouri Public
Service Commission

**ALLTEL MISSOURI, INC.'S
STATEMENT OF POSITIONS**

ALLTEL Missouri, Inc. ("ALLTEL"), pursuant to the Missouri Public Service Commission's *Order Adopting Procedural Schedule*¹ entered in this matter on March 14, 2002, respectfully submits its Statement of Positions on the Joint List of Issues filed August 15, 2002:

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?

ALLTEL Position: In this proceeding, ALLTEL has submitted a forecasted annual allocated cost study for intrastate access, wherein all costs are based on FCC Parts 36 and 69 rules consistent with its interstate analysis. The cost studies are based on ALLTEL's specific cost data.

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?

ALLTEL Position: There is no necessity for the Commission to adopt a "one-size fits all" cost methodology for all Missouri LECs.

¹ *Order Adopting Procedural Schedule, Clarifying the Scope of This Proceeding, and Concerning Motion to Waive Service Requirement and Motion to Compel Discovery*, Case No. TR-2001-65, March 14, 2002.

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

ALLTEL Position: It is ALLTEL's position that a portion of loop costs should be included in the determination of the cost of switched access. While the FCC is moving to a flat rate basis through increased subscriber line charges to provide for recovery of loop costs, it still recognizes that interstate calls account for 25% of loop costs. State access should also recover 25% of loop costs and local rates should recover 50%.

4. What are the appropriate assumptions and/or the appropriate values for the following inputs?
 - a. Cost of capital
 - b. Switch discounts
 - c. Depreciation
 - d. Maintenance factors
 - e. Common and shared costs
 - f. Fill factors
 - g. Other major assumptions and/or inputs.

ALLTEL Position: For ALLTEL, the appropriate assumptions and/or the appropriate values for the above inputs are contained in the ALLTEL Missouri, Inc. Cost Study, attached as Schedule A (HIGHLY CONFIDENTIAL) to the Direct Testimony of ALLTEL witness Steve Brandon.

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

ALLTEL Position: Yes. Based on the testimony presented in this proceeding, there appears to be general consensus that the current capping mechanism is appropriate and in the public interest.

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

ALLTEL Position: There may be circumstances where a CLEC should not be bound by the cap on switched access rates, such as where a totally facilities-based CLEC can demonstrate that its costs of providing switched access are higher than the rates allowed under the cap.

7. What, if any, course of action can or should the Commission take with respect to switched access as a result of this case?

ALLTEL Position: The Commission need not take any action with respect to switched access as a result of this case.

Respectfully submitted,



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