

BEFORE THE MISSOURI PUBLIC SERVICE COMMISSION

IN THE MATTER OF A)
COMMISSION INQUIRY)
INTO THE POSSIBILITY OF)
IMPAIRMENT WITHOUT) Case No. TO-2004-0207
UNBUNDLED LOCAL CIRCUIT)
SWITCHING WHEN SERVING)
THE MASS MARKET)

**CLEC COALITION'S
DATA REQUESTS TO
THE STAFF OF THE
MISSOURI PUBLIC SERVICE COMMISSION**

AT&T Communications of the Southwest, Inc., AT&T Local Services on behalf of TCG St. Louis, Inc. and TCG Kansas City, Inc., Birch Telecom of Missouri, Inc., and Z-Tel Communications, Inc. (“CLEC Coalition”) submit the following Data Requests (“DRs”) to the Staff of the Missouri Public Service Commission each Missouri CLEC of record in the captioned case by and through its counsel of record:

Instructions and Definitions

1. Your response to the following discovery requests should be filed and served upon attorneys for the CLEC Coalition no later than February 16, 2004. These requests are continuing in nature and are subject to a duty to supplement as provided in Mo.R.Civ.Pro 56.01(e), and, should there be a change or modification necessary in your answers, a supplement to your original answer should be submitted as soon as possible.
2. Service on the CLEC Coalition should be made in person, by facsimile or electronic transmission to:

Bill Magness
Casey & Gentz, L.L.P.
919 Congress Avenue, Suite 1060
Austin, Texas 78701
512-225-0019 (telephone)
512-480-9200 (facsimile)
bmagness@phonelaw.com

3. “You” or “Your” shall mean the Staff of the Missouri Public Service Commission, and includes all agents, employees, representatives, or consultants.

DATA REQUESTS

DR NO. 1: Provide copies of your responses to Data Requests served on you in Case No. TR-2004-0207 by any party, excepting those served on you by any member of the CLEC Coalition.

DR NO. 2: Provide copies of the responses you received to Data Requests you served upon any party in Case No. TR-2004-0207, excepting responses you have received from any member of the CLEC Coalition.

Respectfully submitted,

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/s/ Mark W. Comley

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Attorneys for AT&T Communications of the Southwest, Inc., AT&T Local Services on behalf of TCG St. Louis, Inc. and TCG Kansas City, Inc., Birch Telecom of Missouri, Inc., and Z-Tel Communications, Inc.

Certificate of Service

I hereby certify that a true and correct copy of the above and foregoing document was sent via e-mail on this 26th day of day of January, 2004 to nathan.williams@psc.mo.gov.

/s/ Mark W. Comley