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February 17, 2004

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

FEB 1 7 2004

Missouri Public Service Commission

Re: Case No. TO-2004-0207 Mass Market Impairment Inquiry

Dear Mr. Roberts:

Please find enclosed for filing in the above-referenced case an original and eight (8) copies of the Response To Notice Setting Deadline For Replies filed on behalf of Sage Telecom, Inc. A copy of this filing has been sent this date via electronic mail to counsel for all parties of record.

Sincerely,

Brent Stewart

CBS/bt

Enclosure

cc: Counsel for all parties of record Katherine Mudge

BEFORE THE PUBLIC SERVICE COMMISSION OF THE STATE OF MISSOURI

In the Matter of a Commission Inquiry into) the Possibility of Impairment without) Unbundled Local Circuit Switching When) Serving the Mass Market)

Case No. TO-2004-0207

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FEB 1 7 2004

Missouri Public Servico Commi®Cion

RESPONSE TO NOTICE SETTING DEADLINE FOR REPLIES

COMES NOW Sage Telecom, Inc. ("Sage"), by and through counsel, and for its Response to the Commission's *Notice Setting Deadline For Replies* issued on February

11, 2004 in the above-captioned case, respectfully states as follows:

1. Sage supports Staff's January 21, 2004 proposal for SBC to file its batch hot cut proposal prior to the date for filing direct testimony. Parties need SBC's official position on batch hot cuts in Missouri prior to filing direct testimony. Otherwise, parties are forced to comment on proposals that SBC filed in other states, without knowing whether all of the details of those proposals apply to Missouri. Furthermore, if SBC modifies its position from that put forth in any other state, the parties will have to spend valuable resources making a case against a moving target.

Respectfully submitted,

Katherine K. Mudge, TxBar#14617600 Jason W. Wakefield, TxBar#00789849 SMITH, MAJCHER & MUDGE, L.L.P. 816 Congress Avenue, Suite 1270 Austin, Texas 78701 (512) 322-9044 (512) 322-9020 (fax) <u>kmudge@reglaw.com</u> jwakefield@reglaw.com

and

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ATTORNEYS FOR SAGE TELECOM, INC.

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and correct copy of the foregoing document was sent via electronic mail to counsel for all parties of record in Missouri Public Service Commission Case No. TO-2004-0207 this 17th day of February, 2004.

Charles Brent S