

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

In the matter of the tariff filing of AT&T)
of the Southwest, Inc. concerning revision) Case No. TO-2008-0104
in billing method for certain types of) Tariff Nos. JX-2008-0187, -0188, -0189
prepaid calling cards.)

**STAFF'S RESPONSE IN OPPOSITION TO
OFFICE OF THE PUBLIC COUNSEL'S MOTION TO SUSPEND**

COMES NOW the Staff of the Missouri Public Service Commission and for its response states:

1. On October 12, 2007, the Office of the Public Counsel filed a motion asking the Commission to suspend Tariff Nos. JX-2008-0187, 0188, 0189 filed by AT&T Communications of the Southwest, Inc., to amend its tariffs to revise the method (8:1 decrementation) of billing customers who use certain types of prepaid calling cards issued by AT&T Communications.

2. On October 17, 2007, AT&T Communications filed its response to the Public Counsel's motion. AT&T Communications explains that the proposed rate increase complies with the requirement of Section 392.500(2) RSMo for a ten-day tariff filing for a rate increase for a competitive telecommunications service, that the tariff filing complies with the requirement of 4 CSR 240-32.150(5) that the billing increments must be defined in the company's tariff, and that the point of sale material complies with the customer disclosure requirement of 4 CSR 240-32.160 for prepaid calling cards.

3. The Staff concurs that AT&T Communications' tariff filing complies with the applicable statute and rules.

4. In its response, AT&T Communications notes that it inadvertently failed to update its intrastate tariff prior to beginning distribution of the prepaid calling cards with the 8:1

decrementation. The Staff agrees with AT&T Communications that this is a separate issue from the issues raised by Public Counsel and is not a basis for suspending the tariff filings.

5. At page 6 of its motion, Public Counsel further asks the Commission to direct the Staff to investigate and report to the Commission on the recent changes in the billing method of other AT&T calling cards recently reported in June, 2007, to determine whether that billing method should have first been approved by the PSC. If Public Counsel wishes to conduct a broader investigation of the billing method of other AT&T calling cards, it is certainly authorized and able to do so, and should conduct its own investigation.

WHEREFORE, the Staff requests the Commission to deny Public Counsel's motion.

Respectfully submitted,

/s/ William K. Haas

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CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing have been mailed, hand-delivered, transmitted by facsimile or electronically mailed to all counsel of record this 17th day of October 2007.

/s/ William K. Haas