

October 18, 1999

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Missouri Public Service Commission

The Honorable Dale Hardy Roberts Secretary/Chief Regulatory Law Judge Missouri Public Service Commission 301 West High Street, Floor 5A Jefferson City, Missouri 65101

Re: Case No. TT-99-428, et al

Dear Judge Roberts:

Enclosed, for filing in the above-captioned case, are an original and fourteen copies of Written Questions of Southwestern Bell Telephone Company in Lieu of Cross-Examination.

Please stamp "Filed" on the extra copy and return the copy to me in the enclosed selfaddressed, stamped envelope.

Thank you for bringing this matter to the attention of the Commission.

Very truly yours,

Paul G. Lane

Enclosures

cc: Attorneys of Record

BEFORE THE PUBLIC SERVICE COMMISSION

FILED OCT 1 9 1990

OF THE STATE OF MISSOURI

In the Matter of Alma Telephone Company's Filing to)	
Revise its Access Service Tariff, PSC Mo. No. 2.)	Case No. TT-99-428, et al

WRITTEN QUESTIONS OF SOUTHWESTERN BELL TELEPHONE COMPANY IN LIEU OF CROSS-EXAMINATION

COMES NOW Southwestern Bell Telephone Company (SWBT) and submits the following written questions to AT&T in lieu of cross-examination of R. Mathew Kohly.

- 1. On pages 4-5 of the rebuttal testimony of Mr. Kohly, the assertion is made that there is no industry consensus on the type of records to exchange related to traffic between CLECs and ILECs. With regard to the interconnection agreement between SWBT and AT&T, does AT&T agree that Attachment 12, Compensation, Section 7.2.4 provides that records to be exchanged between those two parties are those contemplated by the Technical Exhibit Settlement Procedures (TESP)?
- 2. Does AT&T agree that the TESP requires the exchange of 92 records between the parties?
- 3. Does AT&T agree that it is not aware of any interconnection agreement between SWBT and any other CLEC and any other CLEC in Missouri which contemplates the exchange of records other than 92 records as provided in the TESP?
- 4. Does AT&T agree that it was provided a copy of the attached letter dated

 September 23, 1999, addressed to various CLECs advising it of the Commission's order in Case

 No. TO-99-254 concerning the exchange of Category 11 records with certain small LECs in

 Missouri?

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- 5. Has AT&T initiated any contact with any members of the Mid-Missouri Group or Small Telephone Company Group since September 23, 1999 to discuss the exchange of records on intraLATA toll traffic that uses the Feature Group C network and terminates to any of those LECs? If so, please state the date of any contact, the parties contacted and the substance of the discussions.
- 6. Do any local exchange customers in Missouri served by an AT&T company place intraLATA toll calls to any Mid-Missouri Group (MMG) companies utilizing the transiting service of SWBT pursuant to an interconnection agreement with Southwestern Bell Telephone? If so, please identify each MMG company to which such traffic is terminated and state whether AT&T has paid any compensation to such MMG company in relation to such calls. In addition, please identify the record type (Category 11 or 92 records) utilized in conjunction with compensation for such calls.
- 7. Do any local exchange customers in Missouri served by an AT&T company place local exchange calls to any Mid-Missouri Group (MMG) companies utilizing the transiting service of SWBT pursuant to a SWBT interconnection agreement. If so, please identify each MMG company to which such traffic is terminated and state whether AT&T has paid any compensation to such MMG company with relation to such calls. In addition, please identify the record type (Category 11 or 92 records) utilized in conjunction with compensation for such calls.

Respectfully submitted,

SOUTHWESTERN BELL TELEPHONE COMPANY

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CERTIFICATE OF SERVICE

Copies of this document were served on the following parties by first-class, postage prepaid, U.S. Mail on October 18,1999.

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