

LAW OFFICES  
BRYDON, SWEARENGEN & ENGLAND  
PROFESSIONAL CORPORATION

DAVID V.G. BRYDON  
JAMES C. SWEARENGEN  
WILLIAM R. ENGLAND, III  
JOHNNY K. RICHARDSON  
GARY W. DUFFY  
PAUL A. BOUDREAU  
SONDRA B. MORGAN

312 EAST CAPITOL AVENUE  
P.O. BOX 456  
JEFFERSON CITY, MISSOURI 65102-0456  
TELEPHONE (573) 635-7166  
FACSIMILE (573) 634-7431  
E-MAIL: WREBSE@AOL.COM

CHARLES E. SMARR  
DEAN L. COOPER  
MARK G. ANDERSON  
TIMOTHY T. STEWART  
GREGORY C. MITCHELL  
RACHEL M. CRAIG  
BRIAN T. MCCARTNEY  
DALE T. SMITH

OF COUNSEL  
RICHARD T. CIOTTONNE

October 21, 1999

FILED<sup>2</sup>

OCT 21 1999

Missouri Public  
Service Commission

Mr. Dale Hardy Roberts  
Secretary/Chief Regulatory Law Judge  
Missouri Public Service Commission  
P. O. Box 360  
Jefferson City, Missouri 65102

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

Dear Mr. Roberts:

Enclosed for filing, please find an original and fourteen (14) copies of the Written Questions of the Small Telephone Company In Lieu of Cross Examination.

Please see that this filing is brought to the attention of the appropriate Commission personnel. If there are any questions regarding this filing, please feel free to give me a call at your convenience. Otherwise, I thank you in advance for your cooperation in this matter.

Sincerely,



W.R. England, III

WRE/da  
Enclosure  
cc: Parties of Record

FILED<sup>2</sup>

OCT 21 1999

Missouri Public  
Service Commission

BEFORE THE PUBLIC SERVICE COMMISSION  
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 THE SMALL TELEPHONE COMPANY**  
**IN LIEU OF CROSS EXAMINATION**

Comes now the Small Telephone Company Group (STCG)<sup>1</sup> and submits the following written questions to AT&T Communications of the Southwest Inc. (AT&T) in lieu of cross examination of its witness R. Matthew Kohly:

1. Does AT&T (or any of its affiliates) operating in its capacity as a competitive local exchange carrier (CLEC) currently originate any local and/or interexchange traffic from its CLEC customers utilizing the Feature Group C (FGC) network?
2. Does AT&T (or any of its affiliates) operating in its capacity as a CLEC currently originate any local and/or interexchange traffic from its CLEC customers utilizing the Feature Group D (FGD) network?
3. Does AT&T (or any of its affiliates) operating in its capacity as a CLEC currently create any originating records for local and/or interexchange traffic originated by its CLEC customers and terminated to customers served by other local exchange companies (LECs)?

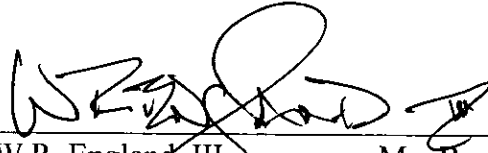
---

<sup>1</sup>Members of which are listed on Attachment A hereto.

4. If the answer to Question No. 3 is yes, please indicate the type(s) of records created by AT&T (or any of its affiliates) and provide a copy if available. Also, please indicate if different records are created if calls are originated on the FGC or FGD network.
5. If AT&T creates originating records for local and/or interexchange traffic originated by its CLEC customers, are those records passed to any other LECs? If so, please identify the LECs that are receiving those records today and the LECs that AT&T would expect to receive those records after elimination of the PTC Plan.
6. Is AT&T (or any of its affiliates) being compensated by SWBT for intraLATA interexchange traffic originated in third party LEC exchanges and terminated to AT&T's CLEC customers via direct interconnections over the FGC network with Southwestern Bell Telephone Company?
7. Is AT&T (or any of its affiliates) being compensated for interexchange traffic originated in third party LEC exchanges and terminated to AT&T's CLEC customers via direct connections with interexchange carriers?
8. If the answer to either Questions No. 6 or 7 preceding is (are) in the affirmative, please indicate the carriers who are paying the terminating compensation to AT&T and the type of compensation being paid for such interexchange traffic (e.g., local, access or other compensation).

9. Are third party LECs being compensated for interexchange traffic originated by AT&T's (or any of its affiliates') CLEC customers and terminating to third party LECs via transiting services offered by Southwestern Bell Telephone Company?
10. Are third party LECs being compensated for interexchange traffic originating in AT&T's (or any of its affiliates') CLEC customers and terminating to third party LECs via interexchange carriers?
11. If the answer either to Questions No. 9 or 10 preceding is (are) in the affirmative, please indicate who is paying the terminating compensation to third party LECs and the type of compensation being paid for such interexchange traffic (e.g., local, access or other compensation).
12. When a customer of a third party LEC originates a 1+ interexchange call that is presubscribed to an interexchange carrier, such as AT&T, is it AT&T's opinion that the interexchange carrier is responsible for paying terminating compensation to all carriers involved in completing that call?
13. Would AT&T's opinion in response to Question No. 12 preceding be different if the 1+ interexchange call is terminated to a wireless carrier? If so, please indicate the reason for the difference of opinion.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'W.R. England, III', written over a horizontal line.

W.R. England, III Mo. Bar #23975  
BRYDON, SWEARENGEN & ENGLAND P.C.  
312 East Capitol Avenue  
P.O. Box 456  
Jefferson City, MO 65102-0456  
(573) 635-7166

Attorney for  
SMALL TELEPHONE COMPANY GROUP

Certificate of Service

I hereby certify that a true and correct copy of the above and foregoing document was mailed or hand-delivered, this 21 day of October, 1999, to:

Dan Joyce  
Missouri Public Service Commission  
P.O. Box 360  
Jefferson City, MO 65102

Mchael Dandino  
Office of Public Counsel  
P.O. Box 7800  
Jefferson City, MO 65102

Leo Bub/Paul Lane  
Southwestern Bell Telephone Company  
One Bell Center  
St. Louis, MO 63101

Craig Johnson  
Andereck, Evans, Milne, et al.  
P.O. Box 1438  
Jefferson City, MO 65102

Charles W. McKee  
Sprint PCS  
4900 Main, 12<sup>th</sup> Floor  
Kansas City, MO 64112

Jeanne A. Fischer  
Southwestern Bell Wireless Inc.  
13075 Manchester Road, 100N  
St. Louis, MO 63131

Linda Gardner  
Sprint Missouri, Inc.  
5454 W. 110<sup>th</sup> Street  
10<sup>th</sup> Floor  
Overland Park, KS 66211

  
W. R. England, III

ATTACHMENT A

BPS Telephone Company  
Cass County Telephone Company  
Citizens Telephone Company  
Craw-Kan Telephone Cooperative, Inc.  
Ellington Telephone Company  
Farber Telephone Company  
Fidelity Telephone Company  
Goodman Telephone Company  
Granby Telephone Company  
Grand River Mutual Telephone Corporation  
Green Hills Telephone Corporation  
Holway Telephone Company  
Iamo Telephone Company  
Kingdom Telephone Company  
KLM Telephone Company  
Lathrop Telephone Company  
Le-Ru Telephone Company  
McDonald County Telephone Company  
Mark Twain Rural Telephone Company  
Miller Telephone Company  
New Florence Telephone Company  
Oregon Farmers Mutual Telephone Company  
Ozark Telephone Company  
Rock Port Telephone Company  
Seneca Telephone Company  
Steelville Telephone Exchange, Inc.