FILED<sup>4</sup>
JAN 1 1 2006

# BEFORE THE PUBLIC SERVICE COMMISSION OF THE STATE OF MISSOURI

Missouri	Public

In the Matter of the Application of SBC Long	)	Service Commission
Distance, LLC, for a Name Change.	)	Case No. XN-2006-0268

## RESPONSE TO ORDER DIRECTING FILING

COMES NOW SBC Long Distance, LLC ("Company") and for its Response to the Missouri Public Service Commission's ("Commission") Order Directing Filing issued January 10, 2006 in the above-referenced matter, respectfully states as follows:

- 1. On December 20, 2005, SBC Long Distance, LLC d/b/a SBC Long Distance, a competitive telecommunications company, filed with the Commission proposed adoption notices and tariff pages reflecting its new fictitious name, AT&T Long Distance, together with a copy of its Registration of Fictitious Name from the Missouri Secretary of State, all in accordance with Commission Rule 4 CSR 240-2.060(5). The proposed tariff sheets bear a proposed effective date of January 20, 2006. (Tariff File Nos. JX-2006-0473 and JX-2006-0474.) On December 28, 2005, the Staff of the Commission filed its Recommendation in this matter, wherein the Staff recommended that the Commission recognize the new fictitious name and approve the proposed tariff sheets.
- 2. As noted in the Commission's Order, during the January 10, 2006 Commission Agenda meeting, the Commissioners inquired of the Missouri Public Service Commission Staff ("Staff") and the Company regarding the d/b/a name change from SBC Long Distance to AT&T Long Distance. The Commission's Order also reflects that both the Staff and the Company agreed to provide additional information to

the Commissioners at the Agenda meeting scheduled on January 12, 2006. The Order directs the Staff and the Company to file written responses, no later than January 11, 2006 at 4:00 p.m., addressing those issues they agreed with the Commissioners to address, and specifically lists four issues therein. Finally, the Order allows the Staff and the Company the opportunity to agree between themselves as to which party will address each listed issue.

- 3. In accordance with the Commission's directive, the Company and Staff have agreed that Company will address issues (a), (c) and (d), and those responses are as follows:
  - (a) Identifying the past and current corporate structure of all SBC and AT&T companies, including fictitious names, operating in Missouri.

**Response:** The Company understands this request to seek information concerning the names of those entities regulated by the Commission both before and after the merger between AT&T Corp. and SBC Communications, and any tariffed d/b/a names. The respective regulated companies operating in Missouri, and the names pre- and post-merger, are:

#### SBC

- 1. Pre-merger: Southwestern Bell Telephone, L.P., d/b/a SBC Missouri Post merger: Southwestern Bell Telephone, L.P., d/b/a AT&T Missouri;
- 2. Pre-merger: SBC Long Distance, LLC d/b/a SBC Long Distance Post-merger: SBC Long Distance, LLC d/b/a AT&T Long Distance;
- 3. Pre-merger: SBC Advanced Solutions, Inc. Post-merger: SBC Advanced Solutions, Inc. d/b/a AT&T Advanced Solutions

#### AT&T

- 1. Pre-merger: AT&T Communications of the Southwest, Inc.
- 2. Pre-merger: TCG St. Louis, Inc.
- 3. Pre-merger: TCG Kansas City, Inc.

The pre-merger AT&T entities continue to operate under the same names post-merger.

### (c) Plans for consolidation of entities and tariffs;

**Response:** The Company does not have any current plans for consolidation of entities or tariffs.

(d) Addressing the possibility of customer confusion by the contemplated name change.

Response: As stated in the tariff cover letter, no rates, terms or conditions of any of the Company's service offerings are being changed as a result of this name change. The only changes to the tariff involve the changes to reflect the new fictitious name under which the Company will operate. Customers of any of the regulated entities affiliated with the former AT&T or the former SBC will continue to be served by that respective entity after recognition of this name change. Customers will continue to contact their respective company regarding inquiries and customer support in the same way as they do today. As discussed in the Agenda meeting, the Company will distribute customer bill messages regarding the name change in March and April billings, with the new name appearing on the April customer billings.

Regarding the specific inquiry raised regarding long distance service marketing activities, on a prospective basis SBC Long Distance, LLC intends to market its long distance services primarily to residential and small business customers, and the Company understands that AT&T Communications of the Southwest, Inc. intends to market its long distance services primarily to large business customers.

WHEREFORE, SBC Long Distance, LLC respectfully submits its Responses to the Commission's Order Directing Filing.

Respectfully submitted,

/s/ Larry W. Dority

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## **CERTIFICATE OF SERVICE**

I hereby certify that the undersigned has caused a complete copy of the attached document to be electronically served on the Commission's Office of General Counsel (at <a href="mailto:gencounsel@psc.mo.gov">gencounsel@psc.mo.gov</a>), and the Office of Public Counsel (at <a href="mailto:opcservice@ded.mo.gov">opcservice@ded.mo.gov</a>), on this 11th day of January, 2006.

/s/ Larry W. Dority