

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

Tari Christ, d/b/a ANJ Communications, et al.	)	
	)	
Complainants,	)	
	)	
v.	)	
	)	Case No. TC-2005-0067
	)	
Southwestern Bell Telephone Company, L.P.,	)	
d/b/a Southwestern Bell Telephone Company,	)	
	)	
Respondent.	)	

**AT&T MISSOURI'S OPPOSITION**

AT&T Missouri<sup>1</sup> respectfully opposes<sup>2</sup> the request filed by Complainants<sup>3</sup> to suspend proceedings for an additional 180 days and for other Commission action.

Following the filing of this Complaint over eight years ago, AT&T Missouri (then SBC Missouri) requested referral of the Complaint to mediation in an attempt to resolve the dispute without the expense of litigation. Complainants agreed. On November 10, 2004, the Commission stayed the proceeding pursuant to 4 CSR 240-2.125(2)(C). This rule provides that after the Commission orders mediation, “all other actions on the case shall cease and all time limitations shall be tolled pending the completion of the mediation process, except as otherwise provided by law.”

AT&T Missouri does not oppose further settlement negotiations with Complainants. AT&T made several materially substantive settlement proposals and has endeavored to respond within 30 days to any counter-proposal received from Complainants. As the status reports submitted to the Commission make clear, AT&T’s settlement proposals have been met with

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<sup>1</sup> Southwestern Bell Telephone Company, d/b/a AT&T Missouri, will be referred to in this pleading as “AT&T Missouri” or “AT&T.”

<sup>2</sup> AT&T submits this response pursuant to the Commission’s February 11, 2013 Order Directing Response.

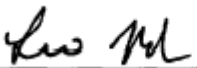
<sup>3</sup> Complainant Tari Christ d/b/a ANJ Communications, et al. will be referred to in this pleading as “Complainants.”

considerable delays from Complainants (often exceeding six months). Complainants still have not responded to AT&T's last offer, made September 7, 2010. The Commission should question whether Complainants' approach here has been designed to stall this proceeding to enable them to lobby for changes in law at the FCC. From AT&T's perspective, nothing will be gained by further delaying this proceeding. In the event an order is issued by the FCC, it can be taken into account by the parties and the Commission during this proceeding. At most, the Commission should limit any suspension of this proceeding to 60 days to allow the parties to complete any outstanding settlement negotiations as contemplated by 4 CSR 240-2.125(2)(C).

WHEREFORE, AT&T respectfully requests the Commission to deny Complainants' Request to Suspend the Proceedings for an Additional 180 days and for Other Commission Action.

Respectfully submitted,

SOUTHWESTERN BELL TELEPHONE COMPANY,  
D/B/A AT&T MISSOURI

BY  \_\_\_\_\_

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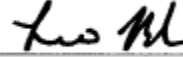
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## **CERTIFICATE OF SERVICE**

Copies of this document were served on the following parties by e-mail on February 25, 2013.



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