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August 15, 2002

Dale Hardy Roberts  
Secretary/Chief Regulatory Law Judge  
Missouri Public Service Commission  
P.O. Box 360  
Jefferson City, MO 65101

FILED<sup>3</sup>

AUG 15 2002

Missouri Public  
Service Commission

Re: Case No. TO-99-227

Dear Judge Roberts:

Attached for filing with the Commission is the original and eight (8) copies of AT&T Communications of the Southwest, Inc.'s Reply to Southwestern Bell Telephone Company's Response in the above-referenced docket.

I thank you in advance for your cooperation in bringing this to the attention of the Commission.

Very truly yours,

Rebecca B. DeCook

Attachment

cc: All Parties of Record

BEFORE THE PUBLIC SERVICE COMMISSION  
OF THE STATE OF MISSOURI

FILED<sup>3</sup>  
AUG 15 2002

Missouri Public  
Service Commission

In The Matter of the Application of Southwestern )  
Bell Telephone Company to Provide Notice of )  
Intent to File an Application for Authorization to ) Case No. TO-99-227  
Provide In-Region InterLATA Service )  
Originating in Missouri Pursuant to Section 271 )  
Of the Telecommunications Act of 1996. )

**REPLY OF AT&T COMMUNICATIONS OF THE SOUTHWEST, INC.  
TO SOUTHWESTERN BELL TELEPHONE COMPANY'S RESPONSE**

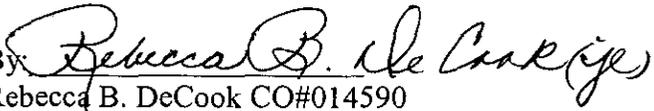
COMES NOW AT&T Communications of the Southwest, Inc. ("AT&T") and hereby files the following Reply to Southwestern Bell Telephone Company (SWBT") Response relating to its update of Attachment 17 of the Missouri 271 Interconnection Agreement (M2A).

1. At the August 1, 2002 prehearing conference, SWBT was asked to provide the Commission with the status of the inclusion of xDSL performance measures in the Update it filed in March 2002. SWBT filed its Response to this request on August 8, 2002.

2. In its Response, SWBT accuses AT&T of misrepresenting the status of the xDSL PM to the Commission. SWBT claims that AT&T misrepresented that SWBT did not seek reconsideration of Texas Order No. 39 and that the Texas Commission entered a subsequent order in response to SWBT's Motion for Reconsideration, deferring consideration of the xDSL PMs to the next six-month review process.

3. AT&T was unaware that SWBT had filed for reconsideration of Order No. 39, as is evidenced by the representation made in AT&T's April 11, 2002 pleading. Since Order No. 42 was not issued until May 9, 2002, AT&T was obviously unaware of this order at the time it filed its pleading in this case and had no order from the Commission to alert it to a Reconsideration Petition by SWBT. Because AT&T was unaware that SWBT filed a

Respectfully submitted the 15<sup>th</sup> day of August, 2002.

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ATTORNEYS FOR AT&T COMMUNICATIONS  
OF THE  
SOUTHWEST, INC.

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that on the 15<sup>th</sup> day of August, 2002 a true and correct copy of "REPLY OF AT&T COMMUNICATIONS OF THE SOUTHWEST, INC. TO SOUTHWESTERN BELL TELEPHONE COMPANY'S RESPONSE" was served by United States mail, first-class postage prepaid, upon the following parties of record.



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