

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

In the Matter of an Interconnection )  
Agreement between Southwestern Bell )  
Telephone, L.P. and Sage Telecom, Inc. )

Case No. TO-2005-0287

**STAFF'S REPLY TO SBC MISSOURI'S AND SAGE'S APRIL 28, 2005 FILING**

COMES NOW the Staff of the Missouri Public Service Commission and for its reply to SBC Missouri's and Sage's April 28, 2005 filing states:

1. In the second paragraph of their joint pleading SBC Missouri and Sage state, "Since the Missouri Amendment now includes the changes urged by the Staff and NuVox and agreed to in the Stipulation and Agreement, no party to this proceeding is contending that the Missouri Amendment is discriminatory or not in the public interest and no party, including the Staff, is opposing Commission approval of the Missouri Amendment."

2. The Staff makes this filing only to make it patently clear that the Staff does not support approval of the Missouri Amendment as a standalone agreement. If the Commission approves the Missouri Amendment as a standalone agreement, the LWC documents would not be available to a competitive local exchange carrier through adoption of the Missouri Amendment. As a result, the references to the LWC documents in the Missouri Amendment would be both discriminatory to carriers not a party to the Missouri Amendment and against the public interest.

WHEREFORE, the Staff submits the foregoing in reply to SBC Missouri's and Sage's April 28, 2005 filing made in response to the Staff's April 27, 2005 response to the Commission's Order Directing Filing.

Respectfully submitted,

DANA K. JOYCE  
General Counsel

**/s/ Nathan Williams**

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Senior Counsel  
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### **Certificate of Service**

I hereby certify that copies of the foregoing have been mailed, hand-delivered, transmitted by facsimile or electronically mailed to all counsel of record this 29<sup>th</sup> day of April 2005.

**/s/ Nathan Williams**

Nathan Williams