

CURTIS, OETTING, HEINZ, GARRETT & SOULE, P. C.
ATTORNEYS AT LAW

130 SOUTH BEMISTON, SUITE 200
ST. LOUIS, MISSOURI 63105
(314) 725-8788
FACSIMILE (314) 725-8789

LELAND B. CURTIS

September 24, 1999

FILED

SEP 27 1999

Mr. Dale Hardy Roberts
Secretary/Chief Regulatory Law Judge
Missouri Public Service Commission
Truman State Office Building, 5th Floor
301 West High Street
Jefferson City, MO 65101

Missouri Public
Service Commission

RE: Case Nos.: TC-2000-225 and TC-2000-226

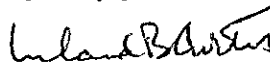
Dear Mr. Roberts:

Enclosed for filing is one original and fifteen copies each of the MCI WorldCom Communications, Inc. and Brooks Fiber Communication of Missouri, Inc. Motion to Consolidate Complaint Cases.

Please stamp "filed" on the extra copy and return the copy to me in the enclosed self-addressed stamped envelope.

Thank you for bringing this matter to the attention of the Commission.

Very truly yours,



Leland B. Curtis

LBC:tm
Enclosures

cc: Parties of Record

FILED

SEP 27 1999

BEFORE THE MISSOURI PUBLIC SERVICE COMMISSION

Missouri Public
Service Commission

MCI WorldCom Communications, Inc.)
)
v.)
)
Southwestern Bell Telephone Co.)

Case No.: TC-2000-225

MOTION TO CONSOLIDATE COMPLAINT CASES

COMES NOW, MCI WorldCom Communications, Inc. (MCIWC), by and through its attorneys pursuant to 4CSR 240-2.080 and for its Motion to Consolidate states:

1. On or about September 10, 1999, MCIWC filed the above referenced complaint with the Commission against Southwestern Bell Telephone Co. (SWBT).

2. On or about September 10, 1999, Brooks Fiber Communications of Missouri, Inc. (Brooks) also filed a similar complaint against SWBT, which was docketed as Case No. TC-2000-226.

3 Both complaints deal with the same subject issue, to wit: failure of SWBT to remit reciprocal compensation to complainants under their interconnection agreements for calls placed by SWBT's customers to complainants' ISP customers. Both complaints involve similar legal and factual issues.

4. Complainants MCIWC and Brooks, while separately certificated by the Commission, are affiliated companies and are represented by the same legal counsel.

5. SWBT is the sole and common Respondent in both complaints and has been served with copies of each complaint.


6. Judicial economy is served and advanced by consolidating both complaints.

7. Brooks will be filing a similar Motion to Consolidate in its Case TC-2000-226.

WHEREFORE, MCIWC, Inc. respectfully request that the Commission grant its Motion to Consolidate the Complaints.

Respectfully submitted,


CURTIS, OETTING, HENIZ,
GARRETT & SOULE, P.C.



Leland B. Curtis, #20550
Carl J. Lumley, #32869
130 South Bemiston, Suite 200
Clayton, Missouri 63105
(314) 725-8788
(314) 725-8789 (Fax)

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of this Motion to Consolidate Complaint Cases has been sent to all parties of record by courier receipted delivery, by first class U.S. Mail, or by facsimile transmission on the 24th day of September, 1999.



Leland B. Curtis

PARTIES OF RECORD:

Office of Public Counsel
Missouri Public Service Commission
301 West High Street, Suite 250
St. Louis, MO 63105

Southwestern Bell Telephone company
One Bell Center, Room 3520
St. Louis, MO 63101