

BEFORE THE MISSOURI PUBLIC SERVICE COMMISSION

PETITION OF MCImetro ACCESS)	
TRANSMISSION SERVICES LLC,)	
BROOKS FIBER COMMUNICATIONS)	
OF MISSOURI, INC. AND MCI)	
WORLDCOM COMMUNICATIONS, INC.)	Case No. TO-2002-222
FOR ARBITRATION OF AN)	
INTERCONNECTION AGREEMENT WITH)	
SOUTHWESTERN BELL TELEPHONE)	
COMPANY UNDER THE)	
TELECOMMUNICATIONS ACT OF 1996)	

MCImetro ACCESS TRANSMISSION SERVICES LLC'S
RESPONSE TO STAFF RECOMMENDATION

Comes Now MCImetro Access Transmission Services, LLC ("MCImetro") pursuant to 4 CSR 240-2.080(15) and for its Response to Staff's Recommendation regarding MCImetro's Interconnection Agreement with Southwestern Bell Telephone, LP d/b/a SBC Missouri ("SBC") states to the Commission:

1. While MCImetro submitted the Interconnection Agreement to the Commission for approval, it has been signed by both parties.

2. MCImetro and SBC agreed to the BFR language and it complies with the Commission's Orders herein regarding Issue 25.

3. MCImetro and SBC agreed to the language concerning combinations of unbundled network elements pursuant to the Commission's Orders herein regarding Issue 7. The provisions of former section 14.2 of Attachment 6 (which were initially ordered deleted prior to the United States Supreme Court decision in Verizon Communications, Inc. v. FCC, 122 S.Ct. 1646 (2002)), are covered by the language the parties have included in section 15 of Attachment 6.

4. MCImetro and SBC agreed to submit the UNE Price appendix as filed. That appendix indicates that certain rates are interim (such as LIDB query access, which was the subject of issue 23) and are to be replaced by the results of Case No. TO-2001-438. While those results were not quite available when the agreement was filed, they are now available and are already incorporated into the agreement by reference. Nonetheless, a formal amendment confirming these rates will be filed shortly after approval of the agreement.

5. MCImetro and SBC agreed to section 3.2 of Attachment 18 (which was considered under issue 26).

6. MCImetro and SBC agreed to section 3.1 of Attachment 27 (which was considered under issue 30).

WHEREFORE, MCImetro Access Transmission Services LLC requests the Commission to approve its Interconnection Agreement with SBC.

Respectfully submitted,

/s/ Carl J. Lumley

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Certificate of Service

A true and correct copy of the foregoing document was sent this 5th day of August, 2003, to the persons listed on the attached list, by placing same in the U.S. Mail, postage paid, by E-mail, and/or by facsimile transmission.

/s/ Carl J. Lumley

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