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August 22, 2000

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Director, Research and Public Affairs

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Director, Utility Operations

ROBERT SCHALLENBERG
Director, Utility Services

DONNA M. KOLILIS
Director, Administration

DALE HARDY ROBERTS
Secretary/Chief Regulatory Law Judge

DANA K. JOYCE
General Counsel

FILED³

AUG 22 2000

Missouri Public
Service Commission

Mr. Dale Hardy Roberts
Secretary/Chief Regulatory Law Judge
Missouri Public Service Commission
P. O. Box 360
Jefferson City, MO 65102

RE: Case No. TC-2000-225, et al.

Dear Mr. Roberts:

Enclosed for filing in the above-captioned case are an original and eight (8) conformed copies of a **STATEMENT OF POSITION**.

This filing has been mailed or hand-delivered this date to all counsel of record.

Thank you for your attention to this matter.

Sincerely yours,

David J. Stueven
Assistant General Counsel
(573) 751-6726
(573) 751-9285 (Fax)

Enclosure

cc: Counsel of Record

BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI

FILED³

AUG 22 2000

MCI WorldCom Communications, Inc.,)
and Brooks Fiber Communications of)
Missouri, Inc., and BroadSpan)
Communications, Inc., d/b/a Primary)
Network Communications, Inc.,)

Complainants,)

vs.)

Southwestern Bell Telephone Company,)

Respondent.)

Missouri Public
Service Commission

Case No. TC-2000-225, et al.

STATEMENT OF POSITION

COMES NOW the Staff of the Missouri Public Service Commission ("Staff") and, for its Statement of Position, states to the Missouri Public Service Commission ("Commission") as follows:

1. The parties filed a joint Statement of the Issues on July 10, 2000. The parties stated the issue as follows:

Is the traffic in dispute subject to local reciprocal compensation under the parties' respective interconnection agreements?

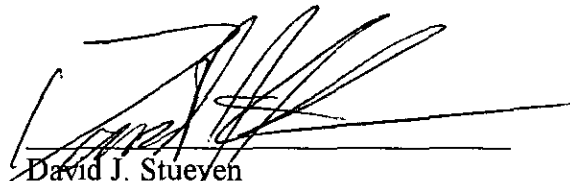
2. The Staff apprises the Commission of its position on the issue as follows:

The Commission should restrict its decision to the interconnection agreements in question. The Commission's decision, therefore, should be limited to the language found in the interconnection agreements, evidence submitted on the negotiations between the parties, and the intent of the parties at the time the interconnection agreement was entered into.

Staff does not have a position on the ultimate question of whether the Respondent owes the Complainants reciprocal compensation on the disputed traffic. Staff was not involved in the negotiation of the interconnection agreements and is not aware of the intent of the parties at the time the agreements were entered into. Further, beyond the testimony filed by the parties, Staff is unaware of any information that it possesses that would have any bearing on the resolution of this Complaint.

Respectfully submitted,

DANA K. JOYCE
General Counsel

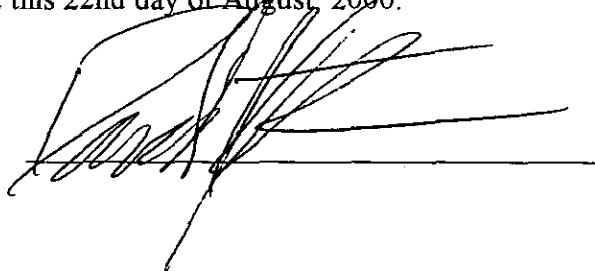


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Certificate of Service

I hereby certify that copies of the foregoing have been mailed or hand-delivered to all counsel of record as shown on the attached service list this 22nd day of August, 2000.



**Service List for
Case No. TC-2000-225 et al.
August 22, 2000**

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