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October 26, 1999

FILED³

OCT 27 1999

Dale Roberts
Secretary/Chief Regulatory Law Judge
Missouri Public Service Commission
Truman State Office Building, 5th Floor
301 West High Street
Jefferson City, Missouri 65101-1517

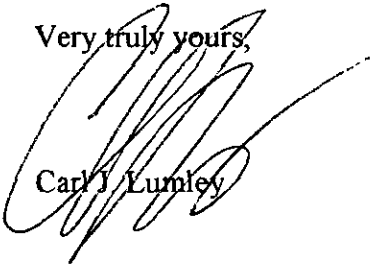
Missouri Public
Service Commission

Re: Case No. TC-2000-225

Dear Mr. Roberts:

Enclosed please find for filing with the Commission an original and fifteen copies of BroadSpan Communications, Inc. d/b/a Primary Network Communications, Inc.'s Motion to Consolidate Complaint Cases. Upon your receipt, please file stamp the extra copy received and return to the undersigned in the enclosed, self-addressed, stamped envelope. If you have any questions, please do not hesitate to contact us.

Very truly yours,


Carl J. Lumley

CJL:dn

Enclosures

cc. Office of Public Counsel (W/Enclosures)
General Counsel (W/Enclosures)
SWBT (W/Enclosures)
MCIWC (W/Enclosures)
Brooks (W/Enclosures)
Colleen Dale (W/Enclosures)

BEFORE THE MISSOURI PUBLIC SERVICE COMMISSION

FILED³

OCT 27 1999

MCI WorldCom Communications, Inc.,
and Brooks Fiber Communications of
Missouri, Inc.,

Complainants,

vs.

Southwestern Bell Telephone Company,

Respondent.

Missouri Public
Service Commission

Case No. TC-2000-225

MOTION TO CONSOLIDATE COMPLAINT CASES

COMES NOW, BroadSpan Communications, Inc. d/b/a Primary Network Communications, Inc. (PNC), by and through its attorneys pursuant to 4 CSR 240-2.080 and for its Motion to Consolidate states:

1. On or about October 21, 1999, PNC filed a complaint with the Commission against Southwestern Bell Telephone Co. (SWBT), which has been docketed as Case No. TC-2000-294.

2. On or about September 10, 1999, MCIWC filed a similar complaint with the Commission against SWBT, which was docketed as Case No. TC-2000-225.

3. 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, and subsequently consolidated with Case No. TC-2000-225.

4. All three 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. All three complaints involve similar legal and factual issues. PNC's Complaint is based on identical contract language as the

Brooks Complaint, in that PNC adopted the reciprocal compensation section of the Brooks/SWBT Interconnection Agreement.

5. SWBT is the sole and common Respondent in all three complaints.

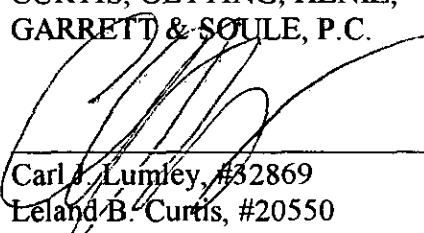
6. Judicial economy is served and advanced by consolidating this complaint with the MCIWC and Brooks matters.

7. Outside counsel for PNC also represents MCIWC and Brooks and hereby represents that MCIWC and Brooks consent to such consolidation.

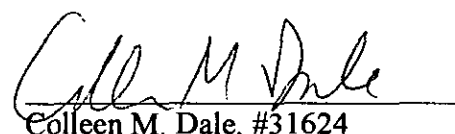
WHEREFORE, BroadSpan Communications, Inc. d/b/a Primary Network Communications, Inc., respectfully requests that the Commission grant its Motion to Consolidate.

Respectfully submitted,

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



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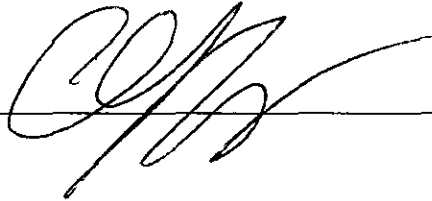


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Attorneys for BroadSpan Communications, Inc.
d/b/a Primary Network Communications, Inc.

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 first class U.S. Mail on on the 26 day of October, 1999.

A handwritten signature in black ink, consisting of stylized, overlapping loops and a long horizontal stroke extending to the right, positioned above a horizontal line.

PARTIES OF RECORD:

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