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August 21, 2000

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

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

F/LED³
AUG 2 1 2000

Service Commission

Dear Mr. Roberts:

CARL J. LUMLEY

Enclosed please find for filing with the Commission in connection with the above-referenced proceeding an original and nine copies of Complainants' Memorandum filing SWBT's Response to Complainants' Request for Admission. Upon your receipt, please file stamp the extra copy received and return to the undersigned. If you have any questions, please do not hesitate to contact us.

CJL:dn

Enclosures

cc. Michael Dandino, Office of Public Counsel (W/Enclosure)
Dan Joyce, General Counsel (W/Enclosure)

Anthony Conroy, SWBT (W/Enclosure)

FILED2 BEFORE THE MISSOURI PUBLIC SERVICE COMMISSION AUG 2 1 2000 MCI WorldCom Communications, Inc., and Brooks Fiber Communications of) Missouri, Inc., and BroadSpan Communications.

Complainants,

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

VS.

Southwestern Bell Telephone Company,

Inc., d/b/a Primary Network Communications,

Inc.,

Respondent.

MEMORANDUM

COME NOW Complainants and herewith file with the Commission Southwestern Bell Telephone Company's Response to Complainants' Request for Admissions which was inadvertently omitted from the Memorandum filed on June 28, 2000 filing Complainants Request for Admissions (with Highly Confidential Exhibits filed under sealed) directed to Southwestern Bell Telephone Company (SWBT) and SWBT's Response thereto as part of their surrebuttal evidence in connection with this proceeding.

> CURTIS, OETTING, HENIZ, GARRETT & SOUVE, P.C.

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

CERTIFICATE OF SERVICE

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Anthony K. Conroy Legal Department Southwestern Bell Telephone Company One Bell Center, Room 3516 St. Louis, MO 63101 (314) 247-0014

BEFORE THE PUBLIC SERVICE COMMISSION OF THE STATE OF MISSOURI

MCI WorldCom Communications,)
Inc. et al.,)
Complainants,) Case No. TC-2000-225, et al.
v.)
Southwestern Bell Telephone Company,)
Respondent.)

SOUTHWESTERN BELL TELEPHONE COMPANY'S RESPONSES TO COMPLAINANTS' REQUEST FOR ADMISSIONS

COMES NOW Southwestern Bell Telephone Company (SWBT), and without waiving any of its objections, provides the following Responses to Complainants' Request for Admissions:

- 1. SWBT admits Exhibit RFA-1 contains true and accurate copies of several e-mail messages depicted therein, which were previously produced to Complainants by SWBT.
- 2. SWBT admits that portions of Exhibit RFA-2 are a true and accurate copy of correspondence and attachments thereto from L.C. Sauer dated June 3, 1997, which were previously produced to Complainants by SWBT. The letter dated June 5, 1997 included in RFA-2 does not appear to be part of this correspondence or an attachment thereto.
- SWBT admits that Exhibit RFA-3 contains true and accurate copies of correspondence and attachments thereto depicted therein, which were previously produced to Complainants by SWBT.
- 4. SWBT admits that Exhibit RFA-4 is a true and accurate copy of the letter depicted therein, which was previously produced to Complainants by SWBT.

- 5. SWBT admits that Cadieux Schedule 1 attached to Complainants' Request for Admissions is a true and accurate copy of the June 9, 1997 letter from Larry B. Cooper to Edward Cadieux.
 - 6. There is no Request for Admission No. 6.
- 7. SWBT admits that Price Schedule No. 4 is a true and accurate copy of a letter which was sent by Larry B. Cooper to MFS on or about June 9, 1997.
- 8. SWBT admits that Price Schedule No. 5 attached to Complainants' Request for Admissions is a true and accurate copy of a letter from Larry B. Cooper to Alex J. Harris at MFS.

Respectfully submitted,

SOUTHWESTERN BELL TELEPHONE COMPANY

PAUL G. LANE

#27011

LEO J. BUB

#34326

ANTHONY K. CONROY

#35199

MARY B. MACDONALD

#37606

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314-235-6060 (Telephone)

314-247-0014 (Facsimile)

e-mail address: anthony.conroy@sbc.com

CERTIFICATE OF SERVICE

A copy of the foregoing was mailed prepaid postage to Carl J. Lumley, Curtis, Oetting, Heinz, Garrett & Soule P.C., 130 S. Bemiston, Suite 200, Clayton, Missouri 63105 on June 5, 2000.

Anthony K. Conroy