

CURTIS, OETTING, HEINZ, GARRETT & O'KEEFE, P. C.
ATTORNEYS AT LAW

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

CARL J. LUMLEY
PRINCIPAL

CLUMLEY@COHGS.COM

June 7, 2002

Secretary of the Commission
200 Madison Street, Suite 100
P.O. Box 360
Jefferson City, Missouri 65102-0360

Via Federal Express
833733654386

Re: Case No.: TO-2002-397

Dear Secretary of the Commission:

Enclosed please find for filing with your office an original and nine (9) copies of MCI WorldCom Communications, Inc., Brooks Fiber Communications of Missouri, Inc. and MCI metro Access Transmission Services, LLC Reply to SWBT's Response to the Commission's Order Directing Filing. Upon your receipt, please file stamp the extra copy received and return to the undersigned. If you have any questions, please contact me.

Very truly yours,


Carl J. Lumley

CJL:dn
Enclosures
cc. Parties of Record (W/Enclosure)

BEFORE THE MISSOURI PUBLIC SERVICE COMMISSION

In the Matter of the Determination of Prices)
of Certain Unbundled Network Elements.)

Case No. TO-2002-397

MCI WORLDCOM COMMUNICATIONS, INC.'S
BROOKS FIBER COMMUNICATIONS OF MISSOURI, INC.'S
AND MCImetro ACCESS TRANSMISSION SERVICES, LLC'S
REPLY TO SWBT'S RESPONSE TO THE COMMISSION'S ORDER
DIRECTING FILING

COME NOW MCI WorldCom Communications, Inc., Brooks Fiber Communications of Missouri, Inc. and MCImetro Access Transmission Services, LLC (WorldCom) and for their Reply to SWBT's Response to the Commission's Order Directing Filing dated May 28, 2002 state to the Commission:

1. WorldCom will not reiterate the comments that it and other parties have already made in support of IP's Motion for Protective Order. These prior comments in general fully refute the points asserted in SWBT's pleading. However, there are two points in SWBT's Response to which WorldCom will reply.

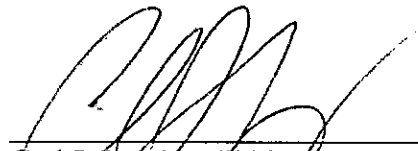
2. SWBT states at page 5 of its Response that it believes that it should have greater access to confidential information in the Mid-Missouri case (TC-2002-190) because it "should have the right for its internal technical and regulatory personnel to see the usage information upon which [Mid-Missouri's] charges are based." (SWBT Response, p. 5). Likewise, WorldCom submits that it should have the right to have a limited number of internal personnel see the information upon which will be based the UNE rates SWBT charges WorldCom in the future.

3. SWBT attempts to latch-on to the fact that WorldCom recently sought a "standard" protective order in Case No. TT-2002-472 regarding SWBT's discriminatory and anticompetitive winback tariffs. That case is on a fast track and WorldCom already had served discovery upon SWBT when it made the request. Some access to information was preferable to no access and

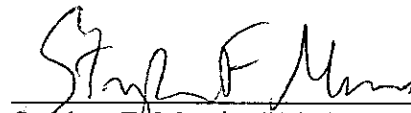
absent a protective order SWBT would not produce any confidential information. WorldCom felt that the dispute over changing the "standard" protective order did not need to be injected into yet another proceeding. As indicated in its prior Response herein, WorldCom would prefer to have a "new and improved" protective order, that affords some internal access to highly confidential information, ultimately issued in the winback tariff case as well as other pending cases.

WHEREFORE, WorldCom prays the Commission to take this reply into account when ruling upon IP's Motion for Protective Order.

Respectfully submitted,



Carl J. Lumley, #32869
Leland B. Curtis, #20550
130 S. Bemiston, Suite 200
Clayton, MO 63105
(314) 725-8788
(314) 725-8789 (FAX)
clumley@cohgs.com
lcurtis@cohgs.com

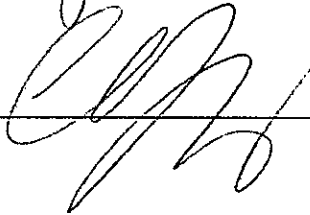


Stephen F. Morris, #14501600
WorldCom
701 Brazos, Suite 600
Austin, Texas 78701
(512) 495-6721
(512) 495-6706 (FAX)
stephen.morris@wcom.com

Attorney for MCI WorldCom Communications, Inc.
Brooks Fiber Communications of Missouri, Inc.,
MCImetro Access Transmission Services, LLC,

Certificate of Service

A true and correct copy of the foregoing was served upon the parties identified on the attached service list on this 7 day of June, 2002, by placing same in the U.S. Mail, postage paid.



Office of Public Counsel
P.O. Box 7800
Jefferson City, MO 65102
mdandino@mail.state.mo.us

Lisa Creighton Hendricks
Sprint
Mail Stop KSOPHN0212-2A253
6450 Sprint Parkway, Bldg. 14
Overland Park, KS 66251
lisa.c.creightonhendricks@mail.sprint.com

Carol Keith
NuVox Communications
16090 Swingley Ridge Road, Suite 500
Chesterfield, MO 63017
ckeith@nuvox.com

Sondra B. Morgan
Brydon, Swearngen & England
P.O. Box 456
Jefferson City, MO 65102
smorgan@brydonlaw.com

General Counsel
Missouri Public Service Commission
P.O. Box 360
Jefferson City, MO 65102
whaas01@mail.state.mo.us

Mark P. Johnson, Trina R. LeRiche
Sonnenschein, Nath & Rosenthal
4520 Main Street, Suite 1100
Kansas City, MO 64111
mjohnson@sonnenschein.com

Rebecca B. DeCook
AT&T
1875 Lawrence Street, Room 1575
Denver, CO 80202
decook@att.com

Paul H. Gardner
Goller, Gardner & Feather, P.C.
131 E. High Street
Jefferson City, MO 65101
info@gollerlaw.com

David J. Stueven
IP Communications
6405 Metcalf, Suite 120
Overland Park, KS 66202
dstuevan@ip.net

Paul Lane
Southwestern Bell Telephone Co.
One Bell Center, Room 3520
St. Louis, MO 63101
paul.lane@sbc.com

Brad Kruse
Associate General Counsel
McLeodUSA Telecommunications
Services, Inc.
P.O. Box 3177
Cedar Rapids, IA 52406-3177
bkruse@McLeodUSA.com

Christopher Malish
Mark Foster
Foster & Malish, LLP
1403 West Sixth Street
Austin, TX 78703
markfoster@austin.rr.com

Mary Ann (Garr) Young
William D. Steinmeier, P.C.
P.O. Box 104595
Jefferson City, MO 65110-4595
myoung0654@aol.com

Morton J. Posner
Allegiance Telecom, Inc.
1919 M Street N.W., Suite 420
Washington, D.C. 20036