

BEFORE THE MISSOURI PUBLIC SERVICE COMMISSION

In the Matter of the Application of Southwestern)
Bell Telephone Co., d/b/a SBC Filing Tariff)
Revisions to Suspend Billing and Collection) Case No. TT-2004-0120
Services for a Customer if the Customer is in)
Breach of Any Other Agreement between the) Tariff No.: JI-2004-0176
Parties.

MCI WORLDCOM COMMUNICATIONS, INC.'S
REPLY TO RESPONSES TO MOTIONS TO SUSPEND

COMES NOW MCI WorldCom Communications, Inc. (MCI) pursuant to 4 CSR 240-2.080(15) and for its Reply to Responses to Motions to Suspend states to the Commission:

1. In response to the motions to suspend filed herein by AT&T, Sprint and MCI, Staff recommends suspension of the tariff changes proposed by SBC. Staff states: "AT&T, Sprint and MCI subsequently raised concerns that warrant further consideration." (Staff Response, p. 2). MCI supports Staff's recommendation.

2. In its response, SBC fails to address the substantial concerns raised by AT&T, Sprint and MCI in their respective motions to suspend. In these motions, the movants identify significant ways in which the language proposed by SBC is overreaching, ambiguous, unreasonable, unjust, and illegal. SBC's effort to portray its proposed tariff changes as a "limited attempt" to protect its interests totally ignores the issues raised in the motions to suspend.

WHEREFORE, MCI WorldCom Communications, Inc. respectfully requests the Commission to issue its order granting the Motions to Suspend.

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

/s/ Carl J. Lumley

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

/s/ Stephen F. Morris (by Carl J. Lumley)

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

Certificate of Service

A true and correct copy of the foregoing was served upon the parties identified on the attached service list on this 9th day of October, 2003, by placing same in the U.S. Mail, postage paid.

/s/ Carl J. Lumley

Michael Dandino
Office of the Public Counsel
P.O. Box 7800
Jefferson City, MO 65102
mdandino@ded.state.mo.us

Marc Poston
Deputy General Counsel
Missouri Public Service Commission
P.O. Box 360
Jefferson City, MO 65102
marcposton@psc.state.mo.us

Paul G. Lane
Anthony R. Conroy
Leo J. Bub
Mary B. MacDonald
SBC Missouri
One SBC Center, Room 3516
St. Louis, Missouri 63101

Rebecca B. DeCook
AT&T Communications
1875 Lawrence Street, Suite 1575
Denver, CO 80202

Lisa Creighton Hendricks
Sprint
6450 Sprint Parkway, Bldg. 14
Mail Stop: KSOPHN0212-2A253
Overland Park, Kansas 66251

Stephen F. Morris
MCI
701 Brazos, Suite 600
Austin, Texas 78701