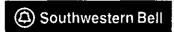
Southwestern Bell Telephone One Bell Center, Room 3520 St. Louis, Missouri 63101 Phone 314 235-4300 Fax 314 247-0014



February 18, 2000

The Honorable Dale Hardy Roberts Secretary/Chief Regulatory Law Judge Missouri Public Service Commission 301 West High Street, Floor 5A Jefferson City, Missouri 65101

Paul G. Lane / Tm

Re: Case No. TO-2000-322

FILED²
FEB 1 8 2000

Missouri Public Service Commission

Dear Judge Roberts:

Enclosed, for filing in the above-captioned case, are an original and fourteen copies each of the non-proprietary version and the highly confidential version (to be filed under seal) of Southwestern Bell Telephone Company's Late-Filed Exhibit No. 38HC.

Thank you for bringing this matter to the attention of the Commission.

Very truly yours,

Paul G. Lane

Enclosures

cc: Attorneys of Record

BEFORE THE PUBLIC SERVICE COMMISSION FEB 1 8 2000

In the Matter of the Petition of DIECA

Communications, Inc. d/b/a Covad

Communications Company for Arbitration

of Interconnection Rates, Terms, Conditions

and Related Arrangements with Southwestern

Bell Telephone Company.

SOUTHWESTERN BELL TELEPHONE COMPANY'S LATE-FILED EXHIBIT

COMES NOW Southwestern Bell Telephone Company ("SWBT") and attaches its Late-Filed Exhibit No. 38HC. This highly confidential exhibit is attached hereto.

WHEREFORE, SWBT respectfully requests the Commission to accept its Late-Filed Exhibit No. 38HC.

SOUTHWESTERN BELL TELEPHONE COMPANY

By Carl C. Cane TM

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EXHIBIT 38NP

The December, 1999 Loop Conditioning Study utilized labor rates for a drafting clerk, a cable splicing technician and an engineer. The following depicts the unloaded and loaded labor rates for these three categories:

	Unloaded <u>Labor Rate</u>	Loaded <u>Labor Rate</u>
1. Drafting Clerk	**	**
2. Cable Splicing Technician	**	**
3. Engineer	**	**

The unloaded labor rate includes wages, benefits, social security, support assets (e.g. motor vehicles and computers) and other direct expenses.

The loaded labor rate includes secretarial support and supervision at the next level of management.

REDACTED

CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing document were served to all parties on the Service List by Facsimile and by Airborne Express on February 18, 2000.

Paul G. Lane

WILLIAM HAAS MISSOURI PUBLIC SERVICE COMMISISON 301 WEST HIGH STREET, SUITE 530 JEFFERSON CITY, MO 65102

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