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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

Re: Case No. TO-2000-322

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 /tm

Paul G. Lane

Enclosures

cc: Attorneys of Record

FILED²

FEB 18 2000

Missouri Public
Service Commission

BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI

FILED²

FEB 18 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.)

Missouri Public
Service Commission

Case No. TO-2000-322

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 Paul G. Lane / 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:

	<u>Unloaded Labor Rate</u>	<u>Loaded 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 / tm
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