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October 11, 2000

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DALE HARDY ROBERTS  
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FILED

OCT 11 2000

Mr. Dale Hardy Roberts  
Secretary/Chief Regulatory Law Judge  
Missouri Public Service Commission  
P. O. Box 360  
Jefferson City, MO 65102

Missouri Public  
Service Commission

**RE: Case No. TE-2000-784 - MCI Telecommunications Corporation, et al. Annual Reports**

Dear Mr. Roberts:

Enclosed for filing in the above-captioned case are an original and eight (8) conformed copies of a **STAFF RECOMMENDATION**.

This filing has been mailed or hand-delivered this date to all counsel of record.

Thank you for your attention to this matter.

Sincerely yours,

*Dennis L. Frey*

Dennis L. Frey  
Assistant General Counsel  
(573) 751-8700  
(573) 751-9285 (Fax)

DLF/tmh  
Enclosure  
cc: Counsel of Record

BEFORE THE PUBLIC SERVICE COMMISSION  
OF THE STATE OF MISSOURI

FILED

OCT 11 2000

Missouri Public  
Service Commission

In Re: Matter of Late Filed Annual )  
Reports of MCI Telecommunications )  
Corporation n/k/a MCI WorldCom )  
Network Services, Inc., Teleconnect Long )  
Distance Service & Systems Company, )  
WorldCom Network Services, Inc., n/k/a )  
MCI WorldCom Network Services, Inc., )  
WorldCom Technologies, Inc., n/k/a MCI )  
WorldCom Communications, Inc., TTI )  
National, Inc., Touch 1 Long Distance, )  
Inc., BLT Technologies, Inc., Brooks )  
Fiber Communications of Missouri, Inc., )  
Metropolitan Fiber Systems, Inc. of St. )  
Louis and Kansas City, and MCImetro )  
Access Transmission Services, LLC. )  
)

Case No. TE-2000-784

STAFF RECOMMENDATION

**COMES NOW** the Staff ("Staff") of the Missouri Public Service Commission  
("Commission") and respectfully states:

1. On May 25, 2000, MCI Telecommunications Corporation n/k/a MCI WorldCom Network Services, Inc., Teleconnect Long Distance Service & Systems Company, WorldCom Network Services, Inc., n/k/a MCI WorldCom Network Services, Inc., WorldCom Technologies, Inc., n/k/a MCI WorldCom Communications, Inc. ("MCIWCC"), TTI National, Inc., Touch 1 Long Distance, Inc., BLT Technologies, Inc., Brooks Fiber Communications of Missouri, Inc. ("Brooks"), Metropolitan Fiber Systems, Inc. of St. Louis and Kansas City ("MFS"), and MCImetro Access Transmission Services, LLC ("MCImetro"), hereinafter collectively to be known as "the Companies," filed with the Commission in the above-styled case a Motion

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seeking Commission acceptance of the Companies' late-filed 1999 annual reports, as well as confidential treatment of portions of the annual reports of MCIWCC, Brooks, MFS, and MCImetro. The Companies are all wholly owned subsidiaries of WorldCom, Inc. ("WorldCom").

2. On September 21, 2000, the Commission issued an order requiring the Staff to file, by October 11, 2000, either a recommendation or a status report in this case.

3. The Staff has reviewed the subject requests and has identified deficiencies in the annual reports of MCIWCC, Brooks, MFS, and MCImetro. These deficiencies have been discussed with WorldCom. Staff estimates, and Worldcom concurs, that a period of 30 days (i.e., by November 10, 2000) will allow sufficient time to correct the deficiencies and re-submit the annual reports. Within 14 days thereafter, Staff intends to file a supplementary recommendation concerning these currently deficient annual reports.

4. Pursuant to 4 CSR 240-10.080(7), the Commission may grant confidential treatment of information in an annual report for good cause. It is to be noted, however, that all of the entities requesting such confidential treatment submitted annual reports containing deficiencies. Accordingly, Staff requests to defer its recommendation concerning confidential treatment until it files its aforementioned supplementary recommendation.

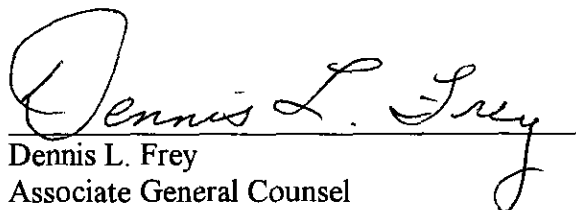
5. It has been the Commission's recent practice to rule on requests for an extension of filing time without the need for a Staff recommendation in cases where, unlike the instant one, said extension is the sole relief sought. As noted in its attached Memorandum (Appendix A), the Staff recommends that the Commission grant the requested extension to MCI Telecommunications Corporation n/k/a MCI WorldCom Network Services, Inc., Teleconnect Long Distance Service & Systems Company, WorldCom Network Services, Inc., n/k/a MCI

WorldCom Network Services, Inc., TTI National, Inc., Touch 1 Long Distance, Inc., BLT Technologies, Inc.

**WHEREFORE**, the Staff respectfully requests that, consistent with its recommendations set forth in the attached Memorandum, the Commission issue an Order: a) granting permission to late-file the 1999 annual reports of MCI Telecommunications Corporation n/k/a MCI WorldCom Network Services, Inc.; Teleconnect Long Distance Service & Systems Company; WorldCom Network Services, Inc. n/k/a MCI WorldCom Network Services, Inc.; TTI National, Inc.; Touch 1 Long Distance, Inc.; and BLT Technologies, Inc.; b) directing WorldCom Technologies, Inc., n/k/a MCI WorldCom Communications, Inc.; Brooks Fiber Communications of Missouri, Inc.; and MCImetro Access Transmission Services, LLC to re-submit their annual reports containing completed financial statements; c) directing Metropolitan Fiber Systems, Inc. of St. Louis and Kansas City to file separate annual reports; and, d) directing the Records Department to return the currently deficient annual reports of WorldCom Technologies, Inc., n/k/a MCI WorldCom Communications, Inc.; Brooks Fiber Communications of Missouri, Inc.; MCImetro Access Transmission Services, LLC; and Metropolitan Fiber Systems, Inc. of St. Louis and Kansas City.

Respectfully submitted,

DANA K. JOYCE  
General Counsel

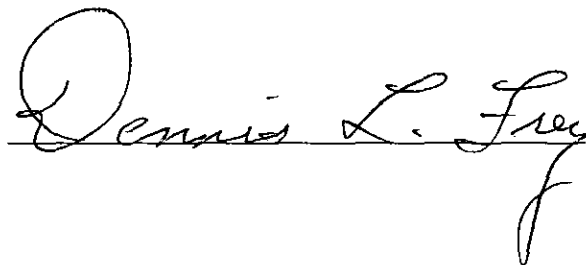
A handwritten signature in cursive script, reading "Dennis L. Frey", written over a horizontal line.

Dennis L. Frey  
Associate General Counsel  
Missouri Bar No. 44697

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### **Certificate of Service**

I hereby certify that copies of the foregoing have been mailed or hand-delivered to all counsel of record as shown on the attached service list this 11th day of October 2000.

A handwritten signature in cursive script, reading "Dennis L. Frey", written over a horizontal line.

**Service List for  
Case No. TE-2000-784  
October 11, 2000**

**Office of the Public Counsel  
P.O. Box 7800  
Jefferson City, MO 65102**

**Carl J. Lumley/Leland B. Curtis  
Curtis, Oetting, Heinz, Garrett & Soule, P.C.  
130 S. Bemiston, Suite 200  
St. Louis, MO 63105**

**Stephen F. Morris  
MCI Telecommunications Corporation  
701 Brazos, Suite 600  
Austin, TX 78701**

## MEMORANDUM

**TO:** Missouri Public Service Commission Official Case File  
Case No. TE-2000-784, MCI Telecommunications Corporation n/k/a MCI WorldCom Network Services, Inc., Teleconnect Long Distance Service & Systems Company, WorldCom Network Services, Inc., n/k/a MCI WorldCom Network Services, Inc., WorldCom Technologies, Inc., n/k/a MCI WorldCom Communications, Inc., TTI National, Inc., Touch 1 Long Distance, Inc., BLT Technologies, Inc., Brooks Fiber Communications of Missouri, Inc., Metropolitan Fiber Systems, Inc., of St. Louis and Kansas City, and MCImetro Access Transmission Services, LLC.

**FROM:** Bill Meyer, Project Coordinator *BM 10/10/2000*  
Roy Boltz, Regulatory Auditor *RB 10/10/2000*  
*William A. Meyer 10/10/2000* *Wm K Haas 10/11/00*  
Project Coordinator/Date General Counsel's Office/Date

**SUBJECT:** Staff Recommendation concerning the request for confidential treatment of the 1999 annual reports and acceptance of late filed 1999 annual reports.

**DATE:** October 10, 2000

On May 25, 2000, MCI Telecommunications Corporation n/k/a MCI WorldCom Network Services, Inc. Teleconnect Long Distance Service & Systems Company, WorldCom Network Services, Inc., n/k/a MCI WorldCom Network Services, Inc., WorldCom Technologies, Inc., n/k/a MCI WorldCom Communications, Inc., TTI National, Inc., Touch 1 Long Distance, Inc., BLT Technologies, Inc., Brooks Fiber Communications of Missouri, Inc., Metropolitan Fiber Systems, Inc., of St. Louis and Kansas City, and MCImetro Access Transmission Services, LLC., all companies are either an alternative basic local exchange carriers (ABLEC) or an interexchange telecommunications carrier (IXC), filed a Motion To Accept Late Filed 1999 Annual Reports And For Treatment of Reports As Highly Confidential, wherein the aforementioned companies requested that the Commission afford confidential treatment of the number of Missouri access lines contained in the annual reports of Brooks Fiber Communications of Missouri, Inc. (Brooks), WorldCom Technologies, Inc., Metropolitan Fiber Systems, Inc. (MFS) and MCImetro Access Transmission Services, LLC (MCImetro). In support of their Motion, the aforementioned companies asserted that the information for which protection is sought contains company specific, state-specific information that is not otherwise publicly available and that the information contained in these reports could be used by competitors to determine the extent of business operations in Missouri, including the extent of network facilities, and other items that are of a competitively sensitive nature. Both a confidential and public version of the 1999 annual reports were filed with the Motion, with the public version stating on the affected pages that "the information has been submitted under seal". The aforementioned parties also requested the Commission to accept the late filed 1999 annual reports.

The Staff noted during its review that the ABLEC annual reports of MCImetro Access Transmission Services, LLC, WorldCom Technologies, Inc. and Brooks Fiber Communications of Missouri, Inc. contained blank financial statements. In addition, the annual report of Metropolitan Fiber Systems, Inc. was filed under the name of Metropolitan Fiber Systems, Inc. of St. Louis and Kansas City. Metropolitan Fiber Systems, Inc. of St. Louis and Metropolitan Fiber Systems, Inc. of Kansas City are two separate companies that should file separate annual reports since there are tariffs filed for each.

The Staff noted during its review, however, that the four entities requesting confidential treatment submitted annual reports containing deficiencies. Consequently, Staff will defer its recommendation concerning confidential treatment until the corrected annual reports are resubmitted.

As a result of discussions with the parent company, WorldCom, Inc., the Staff believes that the currently deficient reports can be resubmitted within thirty days. The Staff should be able to then issue its recommendation regarding those reports within two weeks.

## **RECOMMENDATION**

1. The Staff recommends that the Commission issue an Order granting the request of MCI Telecommunications Corporation n/k/a MCI WorldCom Network Services, Inc., Teleconnect Long Distance Service & Systems Company, WorldCom Network Services, Inc., n/k/a MCI WorldCom Network Services, Inc., TTI National, Inc., Touch 1 Long Distance, Inc. and BLT Technologies, Inc. to accept their late filed annual reports.
2. The Staff recommends that the Commission order the Records Department to return the incorrectly filed versions of annual reports of WorldCom Technologies, Inc., Brooks Fiber Communications of Missouri, Inc., MCImetro Access Transmission Services, LLC, and Metropolitan Fiber Systems of Kansas City and St. Louis.
3. The Staff recommends that the Commission order MCImetro Access Transmission Services, LLC, WorldCom Technologies, Inc. and Brooks Fiber Communications of Missouri, Inc. to resubmit annual reports with the blank financial statements filled in.
4. The Staff recommends that the Commission order Metropolitan Fiber Systems, Inc. of St. Louis and Metropolitan Fiber Systems, Inc. of Kansas City to file separate annual reports.