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November 17, 2000

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

FILED³

NOV 17 2000

Missouri Public
Service Commission

RE: Case No. TE-2000-784

Dear Mr. Roberts:

Enclosed for filing in the above-captioned case are an original and eight (8) conformed copies of the **STAFF'S SUPPLEMENTAL 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
Associate General Counsel
(573) 751-8700
(573) 751-9285 (Fax)

DLF/lb
Enclosure
cc: Counsel of Record

**BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI**

FILED³

NOV 17 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'S SUPPLEMENTAL RECOMMENDATION

COMES NOW the Staff of the Missouri Public Service Commission ("Staff") 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 Missouri Public Service Commission ("Commission") a Motion seeking Commission acceptance of the Companies' late-filed 1999 annual reports, as well as confidential treatment of portions of said 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. On October, 11, 2000, the Staff filed its recommendation, wherein it recommended, in pertinent part, that 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; and c) directing Metropolitan Fiber Systems, Inc. of St. Louis and Kansas City to file separate annual reports. Staff also stated its intention to file a supplemental recommendation in this case.

4. On November 1, 2000, the Commission issued an Order adopting the Staff's recommendations.

5. On November 14, 2000, WorldCom Technologies, Inc., n/k/a MCI WorldCom Communications, Inc.; Brooks Fiber Communications of Missouri, Inc.; MCImetro Access Transmission Services, LLC; Metropolitan Fiber Systems, Inc. of St. Louis, Inc.; and Metropolitan Fiber Systems of Kansas City, Inc., hereinafter collectively to be known as "the Movants", filed a motion requesting permission to late-file their 1999 annual reports and asking that confidential treatment be accorded to the number of access lines of each company.

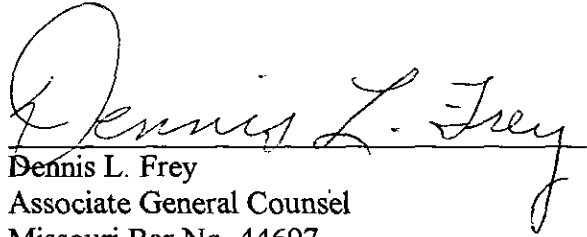
6. Pursuant to 4 CSR 240-10.080(7), the Commission may grant confidential treatment of information in an annual report for good cause.. In the attached Memorandum, which is labeled Appendix A, the Staff states its opinion that the Movants have stated good cause for confidential treatment of the subject information.

7. 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. The Staff is of the opinion that the requested extension should be granted in this case.

WHEREFORE, the Staff respectfully requests that the Commission issue an Order granting the request of WorldCom Technologies, Inc., n/k/a MCI WorldCom Communications, Inc.; Brooks Fiber Communications of Missouri, Inc.; MCImetro Access Transmission Services, LLC; Metropolitan Fiber Systems, Inc. of St. Louis, Inc.; and Metropolitan Fiber Systems of Kansas City, Inc. for confidential treatment of the number of access lines of each company's 1999 annual report. The subject information should be kept under seal until April 15, 2001. Staff further requests that said Order grant the Movants' request for permission to late-file their annual reports.

Respectfully submitted,

DANA K. JOYCE
General Counsel

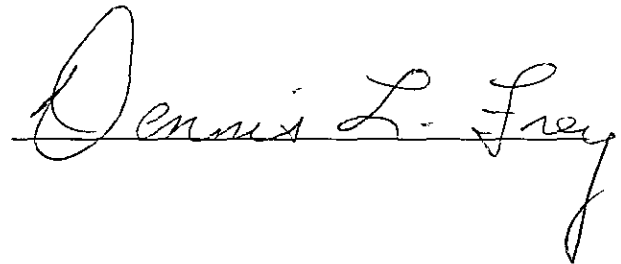
A handwritten signature in cursive script, reading "Dennis L. Frey", written over a horizontal line.

Dennis L. Frey
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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 17th day of November 2000.

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

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 *11/15/2000*
Roy Boltz, Regulatory Auditor *RB 11/15/2000*

[Signature] 11/15/2000
Project Coordinator/Date

[Signature] 11/15/00 *11-15-00*
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: November 15, 2000

On November 14, 2000, WorldCom Technologies, Inc., n/k/a MCI WorldCom Communications, Inc., Brooks Fiber Communications of Missouri, Inc., Metropolitan Fiber Systems of St. Louis, Inc., Metropolitan Fiber Systems of Kansas City, Inc., and MCImetro Access Transmission Services, LLC (herein Movants) filed a Second Motion To Accept Late Filed 1999 Annual Reports And For Treatment of Portions of Reports As Highly Confidential, wherein the aforementioned companies requested that the Commission afford confidential treatment of the number of Missouri access lines (page 8 of the annual report) contained in the annual reports of Brooks Fiber Communications of Missouri, Inc., WorldCom Technologies, Inc., Metropolitan Fiber Systems of St. Louis, Inc., Metropolitan Fiber Systems of Kansas City, Inc., and MCImetro Access Transmission Services, LLC. In support of their Motion, the aforementioned companies (Movants) 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. The competitively sensitive information contained in these reports is not otherwise in the public domain. 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. In the public versions submitted by Movants, a notation on page 8 states that "this information has been filed under seal".

The Staff has reviewed these pages and is of the opinion that this information meets the definition of highly confidential or proprietary, as defined by the protective order issued by the Commission in contested cases, and that, therefore, good cause has been shown based on past Commission practice.

RECOMMENDATION

1. The Staff recommends that the Commission issue an Order granting Movants' request for confidential treatment of the number of Missouri access lines contained in their 1999 annual reports until April 15, 2001. After this date, the information should be transferred to the public record, unless the Companies make a showing that the information remains confidential.
2. The Staff recommends that upon Commission issuance of an Order granting Movants' request, Records Department be ordered to attach a copy of said Order to the public versions already filed.
3. The Staff recommends that the Commission in its Order grant Movants' request to accept late filed 1999 annual reports.

Service List for
Case No. TE-2000-784
November 17, 2000

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