

BEFORE THE MISSOURI PUBLIC SERVICE COMMISSION

In the Matter of an Amendment Superseding)
Certain 251/252 Matters between Southwestern) Case No. TO-2004-0584
Bell Telephone, L.P., and Sage Telecom, Inc.)

MCImetro Access Transmission Services, LLC's
REPLY TO OPPOSITION TO INTERVENTION

COMES NOW MCImetro Access Transmission Services, LLC (MCI) pursuant to 4 CSR 240-2.080(15), and for its Reply to Opposition to Intervention states to the Commission:

1. The interventions filed herein comply with Commission rules. In large part, the issues raised in the oppositions filed by SBC and Sage have been addressed in other pleadings and, unlike SBC and Sage, MCI will not waste the Commission's time by reiterating prior arguments.

2. However, Sage raises one point that requires MCI to provide additional information to the Commission. Sage asserts that MCI's position in this case is inconsistent with its actions regarding a multi-state interconnection agreement MCI has recently made with Qwest. Sage is incorrect. MCI intends to submit the Qwest agreement for approval in the involved states and indeed has already done so in some states. MCI intends to seek approval of the entire agreement, consistent with the requirements of law that it has presented to the Commission in this case.

WHEREFORE, MCImetro Access Transmission Services, LLC, respectfully requests the Commission to issue its order granting MCI's Request to Intervene.

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

/s/ Carl J. Lumley

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Certificate of Service

A true and correct copy of the foregoing was served upon the parties identified on the attached service list on this 26th day of July, 2004, by placing same in the U.S. Mail, postage paid.

/s/ Carl J. Lumley

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