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August 3, 2001

Secretary of the Public Service Commission
Missouri Public Service Commission
200 Madison Street, Suite 100
P.O. Box 360
Jefferson City, Missouri 65102

Via Federal Express

FILED³
AUG 06 2001

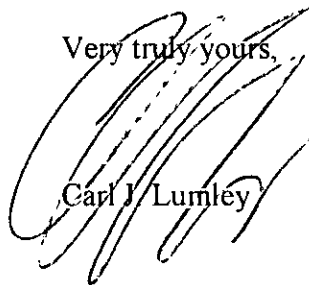
Missouri Public
Service Commission

Re: Case No. TO-2001-467

Dear Secretary of the Commission:

Enclosed please find for filing with the Commission an original and nine (9) copies of Response to Motion to Compel of MCI WorldCom Communications, Inc., Brooks Fiber Communications of Missouri, Inc. and MCImetro Access Transmission Services, LLC. Upon your receipt, please file stamp the extra copies received and return to the undersigned in the enclosed, self-addressed, stamped envelope. If you have any questions, please do not hesitate to contact us.

Very truly yours,



Carl J. Lumley

CJL:dn

Enclosures

cc. Parties of Record (W/Enclosures)

FILED³
AUG 06 2001

BEFORE THE MISSOURI PUBLIC SERVICE COMMISSION

In the Matter of the Investigation of the State)
of Competition in the Exchanges of Southwestern)
Bell Telephone Company.)

Case No. TO-2001-467

Missouri Public
Service Commission

RESPONSE TO MOTION TO COMPEL

Come Now MCI WorldCom Communications, Inc., Brooks Fiber Communications of Missouri, Inc., and MCImetro Access Transmission Services, LLC (herein WorldCom), and for their Response to Staff's Motion to Compel, state to the Commission:

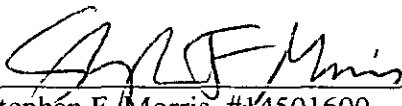
1. WorldCom responded to DR2501 in its response to DR2506. When Staff inquired as to whether WorldCom had responded, this fact was confirmed. Further, WorldCom thereupon resent the information as a separate response to DR2501. WorldCom did not realize that Staff considered the response inadequate until receipt of the Motion to Compel.

2. Upon receipt of the Motion to Compel, WorldCom commenced efforts to provide a more detailed response to DR2501. Such efforts continue and WorldCom will provide a more detailed response as soon as possible. However, the information requested is not kept in the ordinary course and can only be developed by comparing and analyzing multiple sources of data. Hence, the Commission should allow reasonable time for response.

Respectfully submitted,



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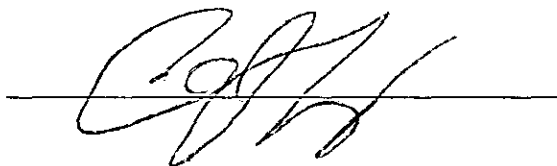


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MCImetro Access Transmission Services, LLC

Certificate of Service

A true and correct copy of the foregoing document was mailed this 3 day of August, 2001, to the persons listed on the attached list, by placing same in the U.S. Mail, postage paid.



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