

BEFORE THE MISSOURI PUBLIC SERVICE COMMISSION

In the Matter of the Second Investigation)	
Into the State of Competition in the)	TO-2005-0035
Exchanges of Southwestern Bell Telephone,)	
L.P., d/b/a SBC Missouri.)	

MCImetro ACCESS TRANSMISSION SERVICES, LLC,
MCI WORLD COM COMMUNICATIONS, INC. AND INTERMEDIA
COMMUNICATIONS, INC. RESPONSES
TO SBC DATA REQUESTS 1-6

MCImetro Access Transmission Services, LLC, MCI WorldCom Communications, Inc., and Intermedia Communications, Inc. (collectively "MCI"), respectfully submit the following responses to Data Requests (the "DRs") 1-6 submitted by SBC Missouri. MCI's responses are made subject to, and without waiver of, the General and Specific Objections MCI previously made in response to SBC Missouri DRs 1-6. MCI's responses are provided by Stephen Morris.

DR No. 1:

Please provide a complete, un-redacted copy of your company's Annual Report to the MoPSC for the years ending (a) December 31, 2001, (b) December 31, 2002, and (c) December 31, 2003.

RESPONSE:

Subject to MCI's objections to this DR, SBC can inspect the non-public versions of the 2003 Annual Reports for MCImetro Access Transmission Services, LLC, MCIWorldCom Communications, Inc., and Intermedia at the offices of Curtis, Heinz, Garrett & O'Keefe pursuant to the terms of the Protective Order. The non-public

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information in these reports is HIGHLY CONFIDENTIAL. This information concerns market specific information relating to services offered in competition with others.

DR No. 2:

Please provide the information requested in the Competitive Local Exchange Carrier Access Line Report from the MoPSC Annual Report for the year ended December 31, 2004 (or the most recent 2004 year to date information available).

RESPONSE:

Subject to MCI's objections to this DR, MCI provides herewith its response to a similar question from Staff as its response hereto. This response to Staff is HIGHLY CONFIDENTIAL. This information concerns market specific information relating to services offered in competition with others.

DR No. 3:

Please state whether your company has any agreement or other arrangement to use facilities (*e.g.* switching, loops, transport) obtained from another telecommunications company other than SBC Missouri to provide any residential or business telecommunications services in Missouri. If so, please identify those other telecommunications companies and provide a copy of the agreement. If no written agreement exists, please provide a general description of the arrangement.

RESPONSE:

Subject to MCI's objections to this DR, MCI states that the only such agreement is addressed in DR4.

DR No. 4:

On December 16, 2004, McLeodUSA announced that it entered into a multi-year wholesale agreement with MCI to enable MCI to provide local telecommunications services to its residential customers using McLeodUSA facilities (a copy of the article is attached). Please (a) state whether Missouri is one of the 25 states covered by this agreement, (b) provide a copy of this agreement, and (c) state approximately when MCI's Missouri customers will be migrated to McLeodUSA facilities.

RESPONSE:

Subject to its objections to this DR, MCI responds as follows:

- (a) Missouri is one of the states covered by this agreement.
- (b) This agreement is highly confidential and based on objections will not be described in detail or provided.
- (c) MCI has not yet made any determinations as to timetables under the McLeod agreement.

DR No. 5:

State whether you offer and/or provide Voice Over Internet Protocol telephone services in Missouri and, if so, then further (a) identify when you began offering and/or providing such services, (b) identify each type and/or class of customer to whom you offer and/or provide such services, (c) identify the specific geographical exchange areas

in which you offer and/or provide such services, (d) state precisely the number of customers you have had for such services as of your last three fiscal and/or calendar years, and (e) provide any and all documents, including but not limited to those indicating customer counts, marketing and/or sales contracts, brochures or other promotional materials, and/or business plans referring or pertaining to your responses to the foregoing subparts (a) through (d).

RESPONSE:

Subject to its objections to this DR, MCI responds as follows:

- (a) In 2001, MCI began offering the MCI Advantage to enable business customers with data networks to utilize those data networks to pass voice traffic. That capability – sometimes referred to as VoIP – allows MCI's business customers to operate more efficiently without having to operate separate voice and data networks.
- (b) The MCI Advantage is a business offering.
- (c) The MCI Advantage is available to customers within MCI's facilities-based footprint, which includes the St. Louis, Kansas City, and Springfield metro areas.
- (d) MCI currently has *** [HIGHLY CONFIDENTIAL] customers of the MCI Advantage in SBC territory in Missouri. This information concerns market specific information relating to services offered in competition with others.
- (e) Information regarding the MCI Advantage is on the following website: http://global.mci.com/external/service_guide/non_reg/cp_mci_advantage.doc.

DR No. 6:

Please provide any and all documents, including but not limited to studies, analyses, research and/or any qualitative or quantitative data, referring or pertaining to the potential and/or actual substitution and/or replacement of (a) wireless services, and/or

(b) Internet, Voice Over Internet Protocol or Internet protocol-enabled services, for wireline local exchange telecommunications services.

RESPONSE:

Subject to its objections to this DR, MCI refers SBC to publicly-available FCC Industry Analysis reports put out by the FCC Wireline Competition Bureau.

Respectfully submitted,

Curtis, Heinz,
Garrett & O'Keefe, P.C.

/s/ Carl J. Lumley

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Attorneys for MCImetro Access
Transmission Services, LLC, MCI
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Intermedia Communications, Inc.

Certificate of Service

A true and correct copy of the foregoing was served upon the parties identified on the attached service list on this 19th day of January, 2005 by either placing same in the U.S. Mail, postage paid or via e-mail:

Leo J. Bub
Southwestern Bell Telephone, L.P.
d/b/a SBC Missouri
One SBC Center, Room 3520
St. Louis, Missouri 63101
(314) 247-0014 (FAX)

/s/ Carl J. Lumley

Missouri Public Service Commission

Data Request

Data Request No.	68, 71, 72
Company Name	MCIMetro Access Transmission Services, LLC MCI WorldCom Communications, Inc. and Intermedia Communications, Inc.
Case/Tracking No.	TO-2005-0035
Date Requested	12/20/2004
Issue	Telephone Specific - Other Telephone Issues
Requested From	Carl Lumley
Requested By	Bill Peters
Brief Description	Access Line Counts
See Attachment Description	Please provide data detailing the number of access lines your company is serving as of December 16, 2004, in SBC Missouri exchanges. Please fill out the attached spreadsheet. It includes residential and business categories of resold, UNE-P, UNE-L, Full Facilities Based for each SBC Missouri exchange.
Response:	Subject to objections, MCI states the line count information is attached for all responding entities. The line count is provided mostly from November 1, 2004 to December 31, 2004. The data contained in the attachment is Highly Confidential. This information concerns market specific information relating to services offered in competition with others.

Response from: Stephen F. Morris, MCI

**PAGES 7-14 OF THIS DOCUMENTS HAVE BEEN CLASSIFIED AS
“HIGHLY CONFIDENTIAL”
IN THEIR ENTIRETY**

NON-PROPRIETARY