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FILED

SEP 18 2001

September 17, 2001

Missouri Public
Service Commission

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

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 Brooks Fiber Communications of Missouri, Inc., MCImetro Access Transmission Services, LLC, and MCI WorldCom Communications, Inc.'s Position Statement. Upon your receipt, please file stamp the extra copy 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)

FILED
SEP 18 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.

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Case No. TO-2001-467

Missouri Public
Service Commission

BROOKS FIBER COMMUNICATIONS OF MISSOURI, INC.,
MCImetro ACCESS TRANSMISSION SERVICES, LLC, and
MCI WORLDCOM COMMUNICATIONS, INC.
POSITION STATEMENT

COMES NOW Brooks Fiber Communications of Missouri, Inc., MCImetro Access Transmission Services, LLC, and MCI WorldCom Communications, Inc. and for their position statement in connection with the above-styled proceeding states as follows:

1. In which Southwestern Bell Telephone Company exchanges, if any, should Southwestern Bell's core business switched services be classified as competitive pursuant to Section 392.245.5 R.S.Mo. 2000?

None. Effective competition does not exist in any SWBT exchange for core business switched services.

2. In which Southwestern Bell Telephone Company exchanges, if any, should Southwestern Bell's business line related services be classified as competitive pursuant to Section 392.245.5 R.S.Mo. 2000?

None. Effective competition does not exist in any SWBT exchange for business line related services.

3. In which Southwestern Bell Telephone Company exchanges, if any, should Southwestern Bell's high capacity exchange access line services be classified as competitive pursuant to Section 392.245.5 R.S.Mo. 2000?

None. Effective competition does not exist in any SWBT exchange for high capacity exchange access line services.

4. In which Southwestern Bell Telephone Company exchanges, if any, should Southwestern Bell's Plexar services be classified as competitive pursuant to Section 392.245.5 R.S.Mo. 2000?

None. Effective competition does not exist in any SWBT exchange for Plexar services.

5. In which Southwestern Bell Telephone Company exchanges, if any, should Southwestern Bell's intraLATA private line/dedicated services be classified as competitive pursuant to Section 392.245.5 R.S.Mo. 2000?

None. Effective competition does not exist in any SWBT exchange for intraLATA private line/dedicated services.

6. In which Southwestern Bell Telephone Company exchanges, if any, should Southwestern Bell's residential access line services be classified as competitive pursuant to Section 392.245.5 R.S.Mo. 2000?

None. Effective competition does not exist in any SWBT exchange for residential access line services.

7. In which Southwestern Bell Telephone Company exchanges, if any, should Southwestern Bell's residential access line related services be classified as competitive pursuant to Section 392.245.5 R.S.Mo. 2000?

None. Effective competition does not exist in any SWBT exchange for residential access line related services.

8. In which Southwestern Bell Telephone Company exchanges, if any, should Southwestern Bell's intraLATA toll services be classified as competitive pursuant to Section 392.245.5 R.S.Mo. 2000?

None. Effective competition does not exist in any SWBT exchange for intraLATA toll services.

9. In which Southwestern Bell Telephone Company exchanges, if any, should Southwestern Bell's Local Plus services be classified as competitive pursuant to Section 392.245.5 R.S.Mo. 2000?

None. Effective competition does not exist in any SWBT exchange for Local Plus services.

10. In which Southwestern Bell Telephone Company exchanges, if any, should Southwestern Bell's Optional Metropolitan Calling Area (MCA) services be classified as competitive pursuant to Section 392.245.5 R.S.Mo. 2000?

None. Effective competition does not exist in any SWBT exchange for Optional Metropolitan Calling Area (MCA) services.

11. In which Southwestern Bell Telephone Company exchanges, if any, should Southwestern Bell's Wide Area Telecommunications Services (WATS) and 800 services be classified as competitive pursuant to Section 392.245.5 R.S.Mo. 2000?

None. Effective competition does not exist in any SWBT exchange for Wide Area Telecommunications Services (WATS) and 800 services.

12. In which Southwestern Bell Telephone Company exchanges, if any, should Southwestern Bell's special access services be classified as competitive pursuant to Section 392.245.5 R.S.Mo. 2000?

None. Effective competition does not exist in any SWBT exchange for special access services.

13. In which Southwestern Bell Telephone exchanges, if any, should Southwestern Bell's switched access services be classified as competitive pursuant to Section 392.245.5 R.S.Mo. 2000?

None. Effective competition does not exist in any SWBT exchange for switched access services.

14. In which Southwestern Bell Telephone Company exchanges, if any, should Southwestern Bell's Common Channel Signaling/Signaling System 7 (SS7) services be classified as competitive pursuant to Section 392.245.5 R.S.Mo. 2000?

None. Effective competition does not exist in any SWBT exchange for Common Channel Signaling/Signaling System 7 (SS7) services.

15. In which Southwestern Bell Telephone Company exchanges, if any, should Southwestern Bell's Line Information Database (LIDB) services be classified as competitive pursuant to Section 392.245.5 R.S.Mo. 2000?

None. Effective competition does not exist in any SWBT exchange for Line Information Database (LIDB) services.

16. In which Southwestern Bell Telephone Company exchanges, if any, should Southwestern Bell's directory assistance (DA) services be classified as competitive pursuant to Section 392.245.5 R.S.Mo. 2000?

None. Effective competition does not exist in any SWBT exchange for directory assistance (DA) services.

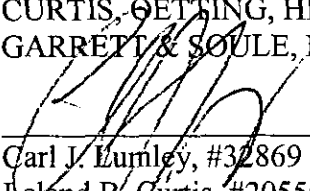
17. In which Southwestern Bell Telephone Company exchanges, if any, should Southwestern Bell's operator services (OS) be classified as competitive pursuant to Section 392.245.5 R.S.Mo. 2000?

None. Effective competition does not exist in any SWBT exchange for operator services (OS).

18. In each exchange served by SWBT, which if any alternative local exchange telecommunications company has been certified under Section 392.455 and has provided basic local telecommunications service in that exchange for at least five years (or if none, what is the longest period of time that a certified alternative local exchange company has provided basic local telecommunications services in that exchange)?

It does not appear that there is any exchange in which an alternative local exchange telecommunications company has been certified under Section 392.455 and has provided basic local telecommunications services in that exchange for at least five years. The largest potential period of time would appear to be the tariff dates cited by Office of Public Counsel witness Meisenheimer (Rebuttal, p. 9), but there does not appear to be evidence of actual continuous provision of service by any particular company in particular exchanges (note position statement prepared prior to receipt of surrebuttal).

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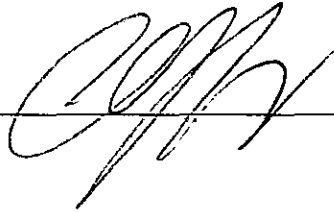


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CERTIFICATE OF SERVICE

A true and correct copy of the foregoing was mailed this 17 day of September, 2001, to the persons listed on the attached service list.



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