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May 7, 2002

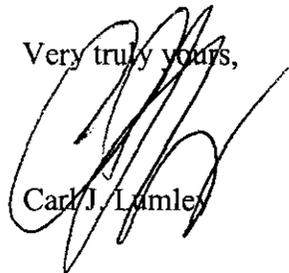
Secretary of the Commission  
200 Madison Street, Suite 100  
P.O. Box 360  
Jefferson City, Missouri 65102-0360

Re: Case No.: TO-2002-222

Dear Secretary of the Commission:

Enclosed please find for filing with your office an original and nine (9) copies of WorldCom's Response to Staff Recommendation and Status Update and SWBT's Response Thereto. Upon your receipt, please file stamp the extra copy received and return to the undersigned in the enclosed, self-address, stamped envelope. If you have any questions, please contact me.

Very truly yours,



Carl J. Lumley

CJL:dn  
Enclosures  
cc. Parties of Record (W/Enclosure)

BEFORE THE MISSOURI PUBLIC SERVICE COMMISSION

PETITION OF MCImetro ACCESS )  
TRANSMISSION SERVICES LLC, )  
BROOKS FIBER COMMUNICATIONS )  
OF MISSOURI, INC. AND MCI )  
WORLDCOM COMMUNICATIONS, INC. ) Case No. TO-2002-222  
FOR ARBITRATION OF AN )  
INTERCONNECTION AGREEMENT WITH )  
SOUTHWESTERN BELL TELEPHONE )  
COMPANY UNDER THE )  
TELECOMMUNICATIONS ACT OF 1996 )

**WORLDCOM'S RESPONSE TO STAFF RECOMMENDATION AND STATUS  
UPDATE AND TO SWBT'S RESPONSE THERETO**

COME NOW MCImetro Access Transmission Services, LLC, Brooks Fiber Communications of Missouri, Inc. and MCI WorldCom Communications, Inc. (collectively "WCOM") and, for their Response to Staff's Recommendation and Status Update and to SWBT's Response thereto state to the Commission:

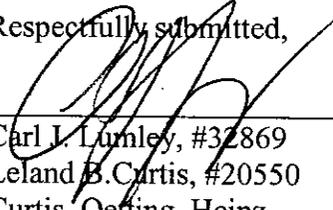
1. As reflected in the Staff Recommendation and SWBT's Response, the Brooks and MCI WorldCom agreements are complete and ready to be submitted to the Commission for approval.
2. As further reflected in the Staff Recommendation and SWBT Response, the MCImetro agreement will be complete and ready to be submitted for approval in short order.
3. Given this status, it is unclear as to why SWBT felt compelled to burden the record with its pleading. The inaccuracies of that pleading unfortunately necessitate a reply. MCImetro did in fact initially suggest several modifications to M2A provisions in conjunction with arbitrated Attachment 27. SWBT indicated it opposed such modifications. When MCImetro withdrew the proposed modifications, SWBT then at the last minute raised a completely new objection to the proposed combination of the M2A and Attachment 27. Because the parties

could not reach agreement at the time, they agreed to submit separate explanations of their positions to the Staff. SWBT prepared its position statement independently, without the input of counsel for WCOM. Likewise, counsel for WCOM properly retained responsibility for preparing WCOM's own statement. After further discussions with Staff, MCImetro again sought to eliminate SWBT's objections, this time by reverting back to the Arbitration Order. SWBT concedes there is no problem with this approach. Yet, SWBT still strives to find some new point of dispute, alleging that MCImetro has future plans that need to be rejected in advance. SWBT's allegations are incorrect and its purported concerns mistaken. Of course, that is why parties are supposed to present disputes when they actually arise, as opposed to when they think they might possibly occur at some point in the future.

4. WCOM suggests that the Commission should simply ignore SWBT's speculation as to the motivations of Staff and WCOM and focus instead on the fact that there is no dispute and agreements can and should be submitted for formal approval. Given that there is no dispute, the parties will be better served focusing on the submission process, instead of posturing about how prior disputes were resolved and erroneously forecasting future disputes.

WHEREFORE, WCOM requests the Commission to accept Staff's Recommendation and direct the parties to submit interconnection agreements for approval (including pre-submission review of the MCImetro agreement by Staff).

Respectfully submitted,



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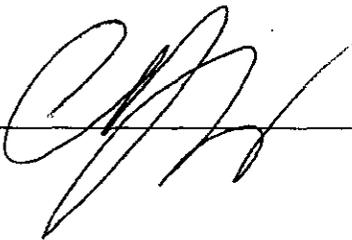
**Certificate of Service**

A true and correct copy of the foregoing document was mailed this 7 day of May, 2002, to the persons listed on the attached list, by placing same in the U.S. Mail, postage paid.

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A handwritten signature in black ink is written over a horizontal line. The signature is stylized and appears to be the initials 'P.L.'.