

CURTIS, OETTING, HEINZ, GARRETT & O'KEEFE, P. C.
ATTORNEYS AT LAW
130 SOUTH BEMISTON, SUITE 200
ST. LOUIS, MISSOURI 63105
(314) 725-8788
FAX (314) 725-8789

CARL J. LUMLEY
PRINCIPAL

CLUMLEY@COHGS.COM

June 13, 2002

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

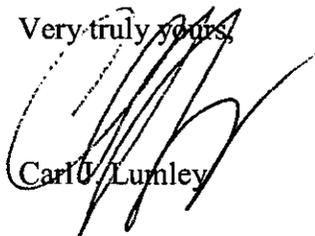
Via Federal Express
833736654001

Re: TO-2002-222

Dear Sir or Madam:

Enclosed please find for filing with the Commission an original and nine copies of Memo Regarding Canceling Prehearing Conference on behalf MCI WorldCom Communications, Inc., Brooks Fiber Communications of Missouri, Inc. and MCImetro Access Transmission Services, LLC. Upon your receipt, please file stamp the extra copy received and return to the undersigned. Thank you.

Very truly yours,



Carl J. Lumley

CJL:dn

Enclosures

cc. Office of Public Counsel (W/Enclosure)
General Counsel (W/Enclosure)
Paul Lane, SWBT (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)

**MEMO REGARDING NOTICE CANCELING
PREHEARING CONFERENCE**

Come Now MCI WorldCom Communications, Inc., Brooks Fiber Communications of Missouri, Inc., and MCImetro Access Transmission Services, LLC ("WorldCom") and for their Memo Regarding Notice Canceling Prehearing Conference state to the Commission:

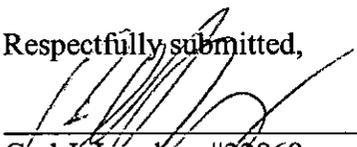
1. As SWBT states in its Notice, it is WorldCom's understanding that the parties have resolved all disputes about implementing the Commission's Arbitration Order. However, SWBT is currently maintaining document control and WorldCom is waiting for SWBT to submit the interconnection agreements for approval in a form that will confirm in writing that all such disputes have been resolved.

2. For sake of clarity, WorldCom states that the discussions between the parties have been concerned with implementation of the Arbitration Order. Disputes remain as to the lawfulness and reasonableness of the Order itself, which will be presented to the Commission upon submission of the interconnection agreements and thereupon to the courts if necessary. As an example, the United States Supreme Court's recent decision in

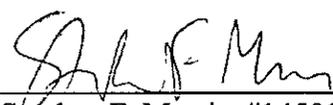
Verizon v. FCC makes clear that the Commission's decision in the Arbitration Order on issue 4 (UNE combinations) was erroneous.

WHEREFORE, MCI WorldCom Communications, Inc., Brooks Fiber Communications of Missouri, Inc., and MCImetro Access Transmission Services, LLC submit this Memo to the Commission.

Respectfully submitted,



Carl J. Lumley, #32869
Leland B. Curtis, #20550
Curtis, Oetting, Heinz,
Garrett & O'Keefe, P.C.
130 S. Bemiston, Suite 200
St. Louis, Missouri 63105
(314) 725-8788
(314) 725-8789 (FAX)
clumley@cohgs.com
lcurtis@cohgs.com



Stephen F. Morris, #14501600
WorldCom
701 Brazos, Suite 600
Austin, Texas 78701
(512) 495-6721
(512) 495-6706 (FAX)
stephen.morris@wcom.com

Attorneys for MCImetro Access Transmission Services, LLC
Brooks Fiber Communications of Missouri, Inc. and
MCI WorldCom Communications, Inc.

Certificate of Service

A true and correct copy of the foregoing document was mailed this 13 day of June, 2002, to the persons listed on the attached list, by placing same in the U.S. Mail, postage paid.

Office of Public Counsel
P.O. Box 7800
Jefferson City, Missouri 65101

General Counsel
P.O. Box 360
Jefferson City, Missouri 65101

Paul Lane
Southwestern Bell Telephone Co.
One Bell Center, Room 3520
St. Louis, Missouri 63101

