

July 12, 1999

Ms. Carole Washburn, Executive Secretary
Washington Utilities and Transportation Commission
1300 S. Evergreen Park Drive S. W.
P.O. Box 47250
Olympia, Washington 98504-7250

Re: UT-990022, Request for Competitive Classification of High Capacity Circuits in Selected Geographical Locations

Dear Ms. Washburn,

This letter is in response to the discovery conference held on June 24, 1999. Parties were ordered to respond to AT&T's discovery requests, issued on June 25, 1999, and U S WEST's response to those requests, filed on July 2, 1999.

As stated on the June 24, 1999, conference, MCI WorldCom will provide the circuit information requested, requests 6 through 14, to the extent that the information is kept by MCI WorldCom in the manner requested. There are certain requests, however, that MCI WorldCom and other CLECs should not be required to answer.

Questions 1 through 5 are specific to U S WEST and, thus, should not be answered by MCI WorldCom and other CLECs. MCI WorldCom also agrees with AT&T's July 7, 1999, motion to compel. U S WEST should be ordered to provide answers to questions 15 through 18. The data requests are intended to seek information necessary for the Commission to answer factors in WAC 4808-120-022 and RCW 80.36.330. CLECs, however, should not have to provide that same information, for several reasons. U S WEST has the burden of proof in the proceeding, the information requested is specific to U S WEST, and unlike U S WEST, CLEC's actions or inactions will not impact U S WEST's ability to provide service to its end user customers.

Sincerely,

Rogelio E. Peña

cc: Terrence Stapleton, ALJ (via electronic and regular mail)
Service List (via electronic and regular mail)