

BEFORE THE WASHINGTON UTILITIES AND TRANSPORTATION
COMMISSION

In the Matter of the Investigation Into)	
U S WEST Communications, Inc.'s)	Docket No. UT-003022
Compliance With Section 271 of the)	
Telecommunications Act of 1996)	
_____)	
)	
In the Matter of U S WEST Communications)	Docket No. UT-003040
Inc.'s Statement of Generally Available)	
Terms Pursuant to Section 252(f) of the)	
Telecommunications Act of 1996)	

**WORLDCOM'S RESPONSE TO QWEST AND AT&T'S MOTIONS RELATING
TO THE 18TH SUPPLEMENTAL ORDER**

WorldCom, Inc., on behalf of its regulated subsidiaries operating in Washington ("WorldCom"), pursuant to the Washington Utilities and Transportation Commission's (the "Commission's") October 2, 2001 Notice of Opportunity to File Responses to Motion to Reschedule, hereby responds to AT&T's Motion for Reconsideration and for Clarification of the Eighteenth Supplemental Order and Qwest's Request for Modification/Clarification of the Procedural Schedule Established in the 18th Supplemental Order.

1. With regard to the October 17, 2001 prehearing conference, AT&T notes a conflicting technical conference in Qwest's Section 271 proceeding in Colorado. WorldCom's representatives will also be involved in the Colorado technical conference and joins in AT&T's to postpone the prehearing conference here in Washington. In addition, WorldCom asks the Commission to postpone the prehearing conference because the facilitator's report on Qwest's Performance Assurance Plan ("QPAP"), originally due to be issued on October 12, 2001, is now expected to be issued on October 22, 2001. The

parties will need time to review and assess the facilitator's report prior to the prehearing conference. Consequently, WorldCom requests that the Commission reschedule the prehearing conference to sometime during the week of October 29, 2001.

2. With regard to the December 5-10, 2001 hearing dates, AT&T notes a conflicting Arizona workshop on the draft final OSS report. Like AT&T, WorldCom's key representatives will be involved in the Arizona workshop and unable to attend a hearing in Washington during that week. Therefore, WorldCom joins in AT&T's request to reschedule the hearing. During the months of December and January, WorldCom representatives are available on the following dates:

- December 12-14, 2001
- December 17-21, 2001
- January 21-25, 2002
- January 28-February 1, 2002.

3. With regard to the issues raised by AT&T and Qwest regarding the evidentiary proceeding to consider the ROC OSS test results and the CICMP, WorldCom agrees with the arguments of AT&T. This Commission should focus its analysis on the ROC OSS "final" report, not the "draft" final report, as Qwest suggests. Precious time and resources would be wasted if all involved were required to file separate sets of comments and participate in simultaneous proceedings evaluating the "draft" report. Efficiency would be gained by instead requiring parties to comment in each state, including Washington, only on a "final" report issued by the ROC OSS vendor. The ROC OSS process was aimed to consolidate the states' reviews of Qwest's OSS. Why break up the

consolidated process before it is complete? Qwest has presented no legitimate reason to do so.

4. Finally, WorldCom agrees with AT&T that the parties should have at least three weeks after the issuance of the “final” report before the Commission conduct its hearing on the ROC OSS report. This will enable the parties sufficient time to review and assess each other’s comments, conduct limited discovery and present their views to the Commission in a meaningful way.

Respectfully submitted this 5th day of October 2001.

WORLDCOM, INC.

By: _____/S/
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