



April 10, 2000

BY ELECTRONIC TRANSMISSION AND REGULAR MAIL

Carole Washburn
Executive Secretary
Washington Utilities and Transportation Commission
1300 S. Evergreen Park, S.W.
Olympia, WA 98504
<http://records@wutc.wa.gov>

Re: WA UT 960369 – Response to U S WEST's and GTE's motion to Strike CLEC briefs.

Dear Ms. Washburn:

This letter is written on behalf of MCI WorldCom, Inc. and AT&T Communications of the Pacific Northwest, Inc. in opposition to U S WEST's and GTE's joint motion to strike the briefs filed by all the CLECs in this proceeding. The ILECs principal objection to the CLEC's consensus recommendation to the Commission to establish five geographically deaveraged rate zones for each ILEC employing the methodology recommended by AT&T's witness Mr. Denney. The ILECs incorrectly contend that Confidential Exhibit 2C attached to MCIW's and AT&T's brief and the methodology used to derive the consensus rate zone proposal are not based on the record in this proceeding. For this reason, they move to strike the CLEC's entire briefs, notwithstanding the fact that significant portions of all of the CLEC briefs address issues other than the consensus five zone proposal.

US WEST's and GTE's Motion should be denied. Contrary to the Company's assertions, the consensus proposal is based squarely on the record evidence presented in this proceeding. The revised rate zone proposal was developed using the same methodology as was used to develop the three zone proposal AT&T and MCIW supported at hearing in this matter. Exhibit 2C reflects wire center costs for each of the ILECs generated by Hatfield 3.1 using actual updated line counts received from USWC at the direction of the Commission and incorporating

the corrections recommended by Mr. Tucek on behalf of GTE. The wire center costs reflected for GTE in Exhibit 2C were also included as in an exhibit presented in electronic format by Mr. Tucek in this proceeding. There is thus no basis for striking any portion of the briefs of any of the CLECs.

Sincerely,

Ann Hopfenbeck

cc: Bob Wallis
Michelle Singer-Nelson
Parties of Record