

**BEFORE THE WASHINGTON STATE
UTILITIES AND TRANSPORTATION COMMISSION**

In the Matter of the Petition of)	DOCKET NO. UT-030614
QWEST CORPORATION)	
)	Answer of WorldCom, Inc.
For Competitive Classification of)	to Order Number 16
Business Basic Exchange)	
Telecommunications Services)	

WorldCom, Inc., on behalf of its regulated subsidiaries in Washington, hereby provides responses to the following Commission questions posed in Order No. 16.

Request No. 1

Provide a description of all criteria regarding analog and digital services that you applied when originally replying to Order No. 06.

Response No. 1

WorldCom regulatory reporting personnel received Order No. 06, read it and distributed it to those personnel in the company that would have access to the information requested. Because the questions contained in Order No. 06 did not distinguish between analog and digital services, WorldCom personnel did not distinguish between analog and digital services in the answers.

In the course of responding to the Commission's questions, WorldCom personnel spoke with Staff twice, once to discuss whether numbers reported were facilities-based numbers and the second time to discuss the verification of unbundled network element platform numbers that Qwest submitted relating to WorldCom lines. After the Commission issued Order No. 8, Staff did not initiate a call with WorldCom to determine whether both digital and analog lines were included, nor was the issue otherwise discussed during the other contacts between Staff and WorldCom.

Request No. 2

Provide a description of all criteria regarding analog and digital services that you applied when revising the data you supplied in response to Order No. 6.

Response No. 2

After Staff's testimony was filed in this docket, and Staff represented that it had contacted all responding CLECs to verify that only analog lines were reported, counsel for WorldCom contacted WorldCom regulatory personnel that responded to Order No. 6 to determine whether WorldCom had been contacted by Staff. WorldCom's counsel learned that in fact WorldCom had not been contacted as to whether its responses included only analog lines. Counsel then

requested that WorldCom personnel review the underlying data to determine whether both digital and analog lines were included.

WorldCom personnel reviewed the data to determine the particular technology over which the services contained in the responses are provided. WorldCom had provided separate responses for MCImetro and MFS. For both companies, the unbundled loop services are provided over analog lines. With regard to MFS, in the category of Basic Business Service, MFS originally included both business analog services and special access services. The special access services are provided over digital facilities. Therefore, in the revised MFS responses, WorldCom removed the special access lines from its total of basic business services.

With regard to MCImetro, the company records track the type of facilities over which the services are provided. Therefore, the record keeping process distinguishes between digital and analog services. Consequently, to revise the MCImetro responses, WorldCom regulatory personnel reviewed the underlying data for the original responses and then separated the services based on whether the records indicated that the service was digital or analog.

WorldCom has reported the information requested of it by the Commission Staff to the best of its ability consistent with the instructions and criteria that it was given.

Dated this 17th day of October 2003.

Respectfully Submitted,

MCI

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