WorldCom, Inc., on behalf of its regulated subsidiaries, ("WCom") files the following comments in response to the July 24, 2000 Procedural Order.

On July 24, 2000, the Chief Administrative Law Judge ("ALJ") issued a Procedural Order which gave the parties until August 4, 2000, and August 18, 2000, to file comments and responsive comments, respectively, on any recommended changes to the parties’ earlier comments necessitated as a result of the recent Eighth Circuit decision.

The Eighth Circuit decision does not require a change in WCom’s recommendations for additional phases and the corresponding issues to be addressed in this proceeding. The judgment of the Eighth Circuit has no legal effect until the Eighth Circuit issues its mandate. The mandate will not be issued before September 8, 2000.

Further, there is a high likelihood that parties to that case will seek Supreme Court review and will request a stay of the Eighth Circuit’s decision pending that review. The Supreme Court has already agreed to review the FCC’s pricing methodology (GTE Service...
Corp. v. FCC, 120 S. Ct. 2214, June 5, 2000), and is therefore likely to accept review of this decision of the Eighth Circuit as well.

The Eighth Circuit decision does not alter the list of rates that need to be established, or the need to establish the rates without further delay. The Commission should establish a schedule for the next phase of this proceeding to establish cost-based rates for the loop, including the high frequency portion of the loop, switching and transport.

Dated: August 4, 2000

By

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- AND -

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