

**BOULT
CUMMINGS
CONNERS
& BERRY** PLC

LAW OFFICES
414 UNION STREET, SUITE 1600
POST OFFICE BOX 198062
NASHVILLE, TENNESSEE 37219

Jon E. Hastings
(615) 252-2306
Fax: (615) 252-6306
Email: jhasting@bccb.com

REC'D TO
REGULATORY AUTH.

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TELEPHONE (615) 244-2582

FACSIMILE (615) 252-2380

INTERNET WEB <http://www.bccb.com/>

OFFICE OF
EXECUTIVE SECRETARY

August 18, 2000

K. David Waddell
Executive Secretary
Tennessee Regulatory Authority
460 James Robertson Parkway
Nashville, TN 37243-0505

**In Re: Generic Docket to Establish UNE Prices for Lines Sharing Per FCC 99-355,
and Riser Cable and Terminating Wire as Ordered in TRA Docket 98-00123
Docket No. 00-00544**

Dear David:

Enclosed please find an original and thirteen (13) copies of Comments of MCI WorldCom Inc. and Broadslate Networks, Inc. in the above-referenced docket. Copies have been served on all parties of record.

Very truly yours,

BOULT, CUMMINGS, CONNERS & BERRY, PLC



Jon E. Hastings

JEH/sja
Enclosures

POSTED
8/18/00

**BEFORE THE TENNESSEE REGULATORY AUTHORITY
NASHVILLE, TENNESSEE**

**IN RE: Generic Docket to Establish UNE Prices for Lines Sharing Per FCC 99-355, and
Riser Cable and Terminating Wire as Ordered in TRA Docket 98-00123
Docket No. 00-00544**

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OFFICE OF THE
EXECUTIVE SECRET

**COMMENTS OF MCI WORLDCOM INC.
AND BROADSLATE NETWORKS, INC.**

MCI WorldCom Inc. ("WorldCom") and Broadslate Networks, Inc. ("Broadslate") file the following comments in the above-referenced docket.

WorldCom and Broadslate would like to express its support for the interim rate proposal set forth by the Data Coalition¹. In addition to the rates proposed by the Data Coalition, WorldCom and Broadslate propose the additional rates attached hereto for the elements set forth therein. This proposal is based on WorldCom's analysis and modification of BellSouth's most recent cost model filed in Florida on April 17, 2000. WorldCom and Broadslate believe that their proposed rates are entirely reasonable for the Tennessee Regulatory Authority (the "Authority") to adopt on an interim basis.

The best support available for this proposal is WorldCom's testimony in the Florida costing docket, Florida Public Service Commission Docket No. 990649-TP. Unfortunately, however, that testimony is:

(a) voluminous and addresses all UNEs, not just those at issue in this proceeding

WorldCom's Florida testimony covers a host of topics that affect all UNEs, such as cost of capital and depreciation. As the Authority knows, these subjects are very

¹ The Data Coalition consists of Vectris Telecom, Inc., Bluestar Networks, Inc. and Covad Communications Company.

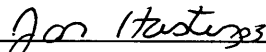
involved and complex and would appear to be more than is necessary for the Authority's consideration for these few interim rates subject to true-up. Moreover, because the Florida docket is far broader than this case, WorldCom's Florida testimony addresses many UNEs that are not part of its very limited interim rate proposal here.

(b) subject to a confidentiality agreement

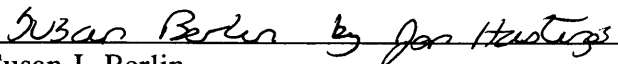
Because BellSouth's model inputs are deemed by BellSouth to be confidential and not to be used outside of the Florida proceeding and because WorldCom makes use of some of these inputs, much of WorldCom's testimony is necessarily restricted to those who have signed a confidentiality agreement as part of the Florida proceeding. In order to file that testimony in this docket, the Authority would have to insure that the information is covered by a protective order in Tennessee.

Therefore, WorldCom and Broadslate request that the Authority direct BellSouth to file the Florida model and its inputs under the Authority's Protective Order filed in this docket on July 19, 2000. This data would then become part of the record and, at that point, WorldCom and Broadslate will be able to file a complete unredacted copy of its Florida evidence for consideration in Tennessee.

Respectfully submitted,



Jon E. Hastings
Boult, Cummings, Conners & Berry, PLC
414 Union Street, Suite 1600
Nashville, Tennessee 37219
(615) 252-2306



Susan J. Berlin
Senior Attorney, WorldCom
6 Concourse Parkway Suite 3200
Atlanta, Georgia 30328
(770) 284-5491

Attorneys for WorldCom

Coleen Covell by Jon Hastings

Coleen Covell

Marc B. Rothschild

Joshua Bobeck

Swidler Berlin Shereff Friedman, LLP

3000 K Street, N.W., Suite 300

Washington, D.C. 20007

Tel: (202) 424-7755

Fax: (202) 424-7643

E-mail: MBRothschild@swidlaw.com

Attorneys for Broadslate

CERTIFICATE OF SERVICE

The undersigned certifies that a copy of the foregoing has been hand delivered or mailed to the following persons on the 18th day of August, 2000.

Guy Hicks

BellSouth Telecommunications, Inc.

333 Commerce Street, Suite 2101

Nashville, TN 37201-3300

John Spilman

Director Regulatory Affairs and Industry Relations

Broadslate Networks, Inc.

675 Peter Jefferson Parkway, Suite 310

Charlottesville, VA 22911

Charles B. Welch, Jr.

Farris Mathews Branan Bobango & Hellen PLC

618 Church Street, Suite 300

Nashville, TN 37219

James B. Wright

United Telephone-Southeast, Inc.

Sprint Communications Company L.P.

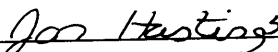
14111 Capital Blvd.

Wake Forest, NC 27587-5900

Jim Lamoureux
AT&T
Promenade 1, 1200 Peachetree Street, N.E.
Atlanta, GA 30309

R. Dale Grimes
Bass, Berry & Sims, PLC
315 Deaderick Street, Suite 2700
Nashville, TN 37238

Henry Walker
Boult, Cummings, Conners & Berry, PLC
414 Union Street, Suite 1600
Nashville, TN 37219


Jon Hastings

A		B		C	D	E	F	G	H	I
BellSouth Cost Calculator 2.3 - Element Summary Report										
1										
2										
3	Study Name:	Tennessee Docket No. 00-00544								
4	State:	Tennessee								
5										
6										
7	Cost Element	Description								
62	D.8.2	Interoffice Transport - Dedicated - OC12 - Facility Termination - Disconnect Only								
63										
64	D.9	INTEROFFICE TRANSPORT - DEDICATED - OC48								
65	D.9.1	Interoffice Transport - Dedicated - OC48 - Per Mile								
66	D.9.2	Interoffice Transport - Dedicated - OC48 - Facility Termination								
67	D.9.2	Interoffice Transport - Dedicated - OC48 - Facility Termination - Disconnect Only								
68	D.9.4	Interoffice Transport - Dedicated - OC48 - Interface OC12 on OC48								
69	D.9.4	Interoffice Transport - Dedicated - OC48 - Interface OC12 on OC48 - Disconnect Only								
70										
71	D.10	INTEROFFICE TRANSPORT - DEDICATED - STS-1								
72	D.10.1	Interoffice Transport - Dedicated - STS-1 - Per Mile								
73	D.10.2	Interoffice Transport - Dedicated - STS-1 - Facility Termination								
74	D.10.2	Interoffice Transport - Dedicated - STS-1 - Facility Termination - Disconnect Only								
75										
76	D.12	INTEROFFICE TRANSPORT - DEDICATED - 4-WIRE VOICE GRADE								
77	D.12.1	Interoffice Transport - Dedicated - 4-Wire Voice Grade - Per Mile								
78	D.12.2	Interoffice Transport - Dedicated - 4-Wire Voice Grade - Facility Termination								
79	D.12.2	Interoffice Transport - Dedicated - 4-Wire Voice Grade - Facility Termination - Disconnect Only								
80										
81	E.0	SIGNALING NETWORK, DATA BASES, & SERVICE MANAGEMENT SYSTEMS								
82										
83	E.6	LNP QUERY SERVICE								
84	E.6.1	LNP Cost Per query								
85	E.6.2	LNP Service Establishment Manual								
86	E.6.2	LNP Service Establishment Manual - Disconnect Only								
87	E.6.3	LNP Service Provisioning with Point Code Establishment								
88	E.6.3	LNP Service Provisioning with Point Code Establishment - Disconnect Only								
89										
90	G.0	SELECTIVE ROUTING								
91										
92	G.9	SELECTIVE ROUTING (INTERIM SOLUTION LINE CLASS CODES)								
93	G.9.1	Selective Routing Per Unique Line Class Code Per Request Per Switch								
94	G.9.1	Selective Routing Per Unique Line Class Code Per Request Per Switch - Disconnect Only								
95										
96	G.11	SELECTIVE CARRIER ROUTING (AIN SOLUTION)								
97	G.11.1	Service Establishment per CLEC								
98	G.11.1	Service Establishment per CLEC - Disconnect Only								
99	G.11.2	Service Establishment per End Office								
100	G.11.2	Service Establishment per End Office - Disconnect Only								
101	G.11.4	Query Cost								
102										
103	I.0	INTERIM SERVICE PROVIDER NUMBER PORTABILITY								
104										
105	I.1	INTERIM SERVICE PROVIDER NUMBER PORTABILITY - RCF								
106	I.1.1	Service Provider Number Portability - RCF, Per Number Ported								
107	I.1.1	Service Provider Number Portability - RCF, Per Number Ported - Disconnect Only								
108	I.1.2	Service Provider Number Portability - RCF, Per Additional Path								
109										
110	I.2	SERVICE PROVIDER NUMBER PORTABILITY - DID								
111	I.2.1	Service Provider Number Portability - DID, Per Number Ported, Residence								
112	I.2.1	Service Provider Number Portability - DID, Per Number Ported, Residence - Disconnect Only								
113	I.2.2	Service Provider Number Portability - DID, Per Number Ported, Business								
114	I.2.2	Service Provider Number Portability - DID, Per Number Ported, Business - Disconnect Only								
115	I.2.4	Service Provider Number Portability - DID, Per Trunk Termination, Initial								

Recurring	Non recurring	MCI WorldCom Proposed			Subsequent
		First	Additional	Initial	
		\$13.71		\$9.36	
\$12.13					
\$7.583		\$25.59		\$7.90	
		\$18.05		\$4.98	
\$887.12		\$0		\$0	
		\$0		\$0	
\$1.49					
\$604.83		\$18.50		\$13.96	
		\$13.71		\$9.36	
\$0.0035					
\$12.20		\$18.15		\$13.56	
		\$13.07		\$8.71	
\$0.0008387					\$25.30
					\$23.27
					\$612.85
					\$399.69
					</

MCI WorldCom Proposed

Recurring	Non recurring	First	Additional	Non-Recurring Initial	Subsequent
		\$13.71		\$9.36	
\$12.13					
\$7.583		\$25.59	\$7.90		
		\$18.05	\$4.98		
\$887.12		\$0	\$0		
		\$0	\$0		
\$1.49					
\$604.83		\$18.50	\$13.96		
		\$13.71	\$9.36		
\$0.0035					
\$12.20		\$18.15	\$13.56		
		\$13.07	\$8.71		
\$0.0008387					
				\$25.30	
				\$23.27	
				\$1.200	\$612.85
				\$543.58	\$399.69

