

MEMORANDUM IN SUPPORT

I. CBT Requests A One-Week Extension of Time in Which to Provide Its Inter-Office Cost Studies.

In the September 10, 1998 Order, the Attorney Examiner ordered CBT to make its inter-office transport cost study available by October 23, 1998. The Order further provided that the intervenors' testimony would be due on November 2, 1998, but testimony on inter-office transport issues could be delayed until November 9, 1998. Subsequently, the schedule was modified to defer filing of all intervenor testimony until November 18, 1998.

After filing its supplemental testimony on September 28, 1998, CBT received numerous data requests from MCI, largely pertaining to the issues addressed in that supplemental testimony. CBT's cost analysts were required to give attention to those data requests in order to meet the shortened seven (7) day discovery response time. The timing of those data requests delayed work on the inter-office transport cost studies, which had already been placed on an aggressive schedule. CBT has been working diligently on the studies, but will not be able to complete all of the inter-office studies by October 23. CBT expects to complete the recurring cost studies for DS1 and DS3 transport and for DS1, DS3, OC3, OC12 and OC48 multiplexing and entrance facilities, and intends to go forward with distribution of those portions of the study on October 23. However, CBT does not expect to be able to complete the portions of the study dealing with non-recurring charges or OC3, OC12 or OC48 inter-office transport for an additional week. The development of the OC3, OC12 and OC48 inter-office transport and non-recurring charge studies is very complex and the additional time is necessary to ensure that they are complete and accurate.

For these reasons, CBT seeks a one-week extension of time, to October 30, 1998, in which to provide the OC3, OC12 and OC48 transport studies and the non-recurring charge cost studies. This should not cause any other changes to the case schedule. Intervenors will still have more time after receipt of the inter-office cost study in which to file their supplemental testimony than was provided in the original schedule. However, there will be significantly less material to respond to than originally planned because part of the inter-office transport study will still be provided on October 23, 1998.

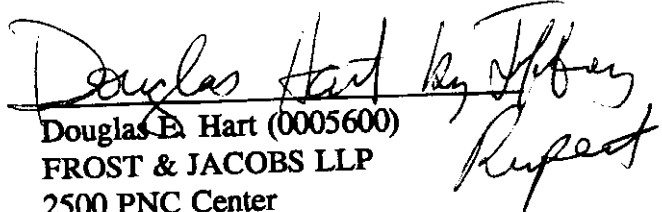
In order to minimize any disruption to the schedule that may be caused by deferral of the inter-office transport cost study, CBT is willing to hold a conference call or group meeting shortly after the studies are distributed to provide explanations of the methodology used in the studies. CBT would address any questions intervenors or Staff have about the study methodology at that time. This should avoid the need for data requests or depositions on the inter-office studies and provide a more meaningful dialogue with intervenors and Staff regarding the issues. CBT would suggest November 5 or 6, 1998 as possible dates upon which to hold such a session.

II. CBT Requests A One-Day Postponement of the Hearing.

CBT is a Petitioner in a federal appellate proceeding pending in the Fifth Circuit Court of Appeals, Texas Office of Public Utility Counsel, et al. v. FCC, et al., Case No. 97-60421. This case involves the FCC's order regarding federal universal service funding. CBT has received oral notice from the Clerk of the Fifth Circuit that oral argument will be heard in New Orleans on December 1, 1998. A formal calendar order is to be released on Friday, October 23, 1998. CBT's counsel for the hearing in this matter is also counsel of record in the

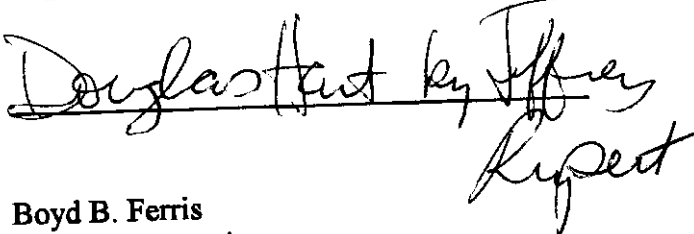
Fifth Circuit proceeding and expects to take part in the oral argument. Therefore, CBT requests that the commencement of this hearing be deferred by one day, until December 2, 1998, in order to accommodate the oral argument in the Fifth Circuit.

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CERTIFICATE OF SERVICE

This is to certify that a copy of the foregoing has been sent by ordinary United States mail, postage prepaid to the following persons on this 20th day of October, 1998.



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