

ILLINOIS
COMMERCE COMMISSION
Aug 29 11 14 AM '01

CHIEF CLERK'S OFFICE

NEW MILLENNIUM TELECOMMUNICATIONS, INC.)
)
COMPLAINANT,) Docket No. 01-0560
)
v.)
)
MCI/WORLDCOM TELECOMMUNICATIONS,)
)
RESPONDENT.)

**ANSWER TO AFFIRMATIVE DEFENSES AND MOTION FOR LEAVE TO
IMPLEAD MCImetro ACCESS TRANSMISSION SERVICES, INC.**

Now Comes New Millennium Telecommunications, Inc. ("NMT") in answer and reply to MCImetro Access Transmission Services, Inc. ("MCImetro") answer and affirmative defenses, states as follows:

1. MCI claims that MCI WorldCom Communications, Inc, ("MCI") is improperly complained of in NMT's complaint. However, on the Commission's website MCImetro is also named as MCI/Worldcom. Moreover, the website provided by the Commission for MCImetro is www.worldcom.com. Therefore, NMT further moves that MCImetro be made as an additional party to NMT's complaint.
2. NMT further answers MCI 's affirmative defenses as follows:

First Affirmative Defense

NMT's complaint fails to state a claim upon which relief can be granted.

Answer:

NMT denies that its complaint fails to state a claim upon which relief can be granted and demand strict proof thereof.

Second Affirmative Defense

Answer:

NMT denies that it has failed to comply with the requirements of 13-515 and demands strict proof thereof.

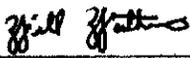
Third Affirmative Defense

NMT states that if MCI has not asserted all of its affirmative defenses in its answer to NMT's complaint, any and all defenses should be deemed waived.

WHEREFORE, NMT prays that this Commission order the relief as requested in its complaint.

Respectfully Submitted,

New Millennium Telecommunications, Inc.

By: 

Will Watkins
Chief Financial Officer

STATE OF ILLINOIS)
)
COUNTY OF COOK)

SS.

AFFIDAVIT

I, Will Watkins, who, after being sworn, deposes and says:

1. I am the Chief Financial Officer of New Millennium Telecommunications, Inc.
2. I have read NMT's Answer to MCI's Affirmative Defenses and Motion for Leave to Implead.
3. The facts alleged therein are true and correct to the best of my knowledge and belief.

Will Watkins

Will Watkins

SUBSCRIBED and SWORN to
Before me this 28th day of
August, 2001

Shannon L. Roark

Notary Public



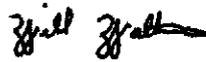
STATE OF ILLINOIS)
)
COUNTY OF COOK)

SS.

PROOF OF SERVICE

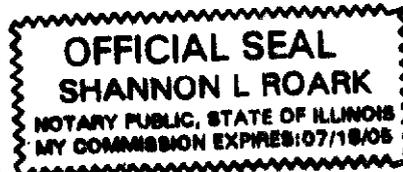
I, Will Watkins, who, after being sworn, deposes and says:

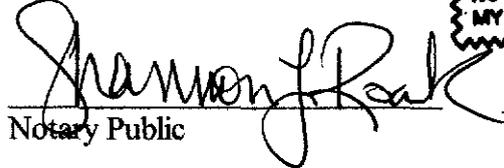
On August 28, 2001, I caused to be served the Answer to Affirmative Defenses and Response to the Motion to Dismiss of New Millennium Telecommunications, Inc. on all parties on the attached service list by hand delivery, fed ex, or U.S. mail.



Will Watkins
Chief Financial Officer
New Millennium Telecommunications, Inc.

SUBSCRIBED and SWORN to
Before me this 28th day of
August, 2001





Notary Public

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