



**MCI Telecommunications Corporation**  
 1801 Pennsylvania Avenue, N.W.  
 Washington, D.C. 20006

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August 1, 1995

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Mr. William F. Caton  
 Secretary  
 Federal Communications Commission  
 Room 222  
 1919 M Street, N.W.  
 Washington, D.C. 20554

AUG 1 1995

FEDERAL COMMUNICATIONS COMMISSION  
 OFFICE OF SECRETARY

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Re: Ex Parte, Petition for Rulemaking to Amend Part 32 of the Commission's Rules to Eliminate Detailed Property Records for Certain Support Assets: RM 8640

Dear Mr. Caton:

On May 10, 1995, the Commission released its Public Notice requesting comments from interested parties on the Petition for Rulemaking ("Petition") filed by the United States Telephone Association ("USTA") on May 31, 1994. USTA's Petition requested that the Commission no longer require local exchange carriers ("LECs") to maintain detailed records on over \$15 billion worth of plant and equipment.

On July 5, 1995, MCI opposed USTA's Petition because USTA had not provided the Commission with sufficient information to assess the validity of its claim that a disproportionate amount of resources are currently being dedicated to maintaining detailed property records for support assets. MCI also opposed USTA's Petition because it seems counter-intuitive for the Commission to grant USTA's request to permit LECs to keep less detailed records in light of the 100 violations, worth nearly \$75 million, that were documented in the Commission's recent audit of the Bell Operating Companies.

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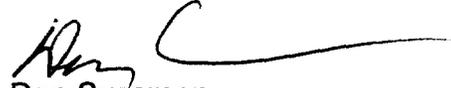
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In the comments filed by MCI on July 5, 1995, MCI inadvertently listed GTE as one of the LECs audited by the Commission. MCI would like to clarify that GTE was not among the carriers audited by the Commission. This correction, however, does not dilute the arguments which MCI presented in its July 5, 1995 comments. MCI maintains its opposition to USTA's Petition, and urges the Commission to deny its Petition for Rulemaking, filed May 31, 1994.

Yours truly,



Don Sussman  
Regulatory Analyst

cc: Debbie Weber  
Gail L. Polivy