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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF SECRETARY

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

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In the Matters of	)	
	)	
Implementation of the Local Competition Provisions of the Telecommunications Act of 1996	)	CC Docket No. 96-98
	)	
Interconnection Between Local Exchange Carriers and Commercial Mobile Radio Service Providers	)	CC Docket No. 95-185
	)	
Area Code Relief Plan for Dallas and Houston, Ordered by the Public Utility Commission of Texas	)	NSD File No. 96-8
	)	
Administration of the North American Numbering Plan	)	CC Docket No. 92-237
	)	
Proposed 708 Relief Plan and 630 Numbering Plan Area Code by Ameritech-Illinois	)	IAD File No. 94-102
	)	

MCI TELECOMMUNICATIONS CORPORATION'S PETITION FOR CLARIFICATION, OR, IN THE ALTERNATIVE, RECONSIDERATION

Pursuant to Section 1.429 of the Commission's Rules and Regulations, 47 C.F.R. 1.429, MCI Telecommunications Corporation, by its undersigned attorneys, asks that the Commission clarify, or if necessary, reconsider its Second Report and Order and Memorandum Opinion and Order (the "Order") released in the above-captioned proceeding on August 8, 1996.[1] As explained herein, the Order fails to clarify, address and dispose of a significant issue raised by several commenters that is inextricably linked

[1] FCC Nos. 96.98, 95-185, 96-8, 92-27 and 94-102, published at 61 Fed. Reg. 47284 (September 6, 1996).

to dialing parity. Accordingly, MCI requests that the Commission clarify that Bell Operating Companies ("BOCs") located in states that have ordered intraLATA dialing parity, be required to provide intraLATA dialing parity for those portions of the LATA that cross that state's boundary, and therefore, are interstate in nature.

BACKGROUND

In its Notice of Proposed Rulemaking initiating this proceeding, the Commission sought comments on the rules authorized by the new section 251(b)(3) of the Communications Act (the "Act"). Section 251(b)(3) of the Act imposes an obligation on all local exchange carriers ("LECs") to provide dialing parity to "competing providers of telephone exchange service and telephone toll service." For purposes of this requirement, "dialing parity" means that customers "can preselect any provider of telephone exchange service or telephone toll service without having to dial extra digits to route a call to that carrier's network."[2] In its comments, Frontier Corporation indicated that the Commission "should mandate that dialing parity be made available immediately for interstate, interLATA calls . . . ."[3] Sprint likewise commented that it would be "pointless to distinguish between interstate intraLATA and intrastate intraLATA toll, since very few end users would likely choose a PIC based upon the interstate intraLATA/intrastate intraLATA distinction."[4]

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[2] Order at ¶ 22.

[3] Frontier Comments at 2.

[4] Sprint Comments at 4.

The Order concludes that dialing parity is required, and that all LECs must "implement intraLATA and interLATA toll dialing parity based on LATA boundaries no later than February 8, 1999."[5] But the Commission neglected to specifically address dialing parity based on LATA boundaries, when the LATA encompasses more than one state.

Section 51.209, states:

Toll dialing parity.

> (a) A LEC shall implement throughout each state in which it offers telephone exchange service intraLATA and interLATA toll dialing parity based on LATA boundaries. When a single LATA covers more than one state, the LEC shall use the implementation procedures that each state has approved for the LEC within that state's borders.

Although the language makes clear that toll dialing parity is based on LATA boundaries, it does not mandate dialing parity for interstate, intraLATA traffic. This begs the question of whether, for example, a BOC in Illinois (where dialing parity has been ordered) must provide dialing parity for a call from Chicago, Illinois, to Gary, Indiana, an interstate, intraLATA toll call.

Since competition over the last several years has developed around the concept of LATAs, MCI agrees that this distinction remains viable, particularly since presubscription has already occurred largely along LATA boundaries. It would be pointless, however, to distinguish between intrastate, intraLATA toll calls and interstate, intraLATA toll calls for purposes of dialing parity.

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[5] Order at ¶ 62(a).

WHEREFORE, for the foregoing reasons, MCI respectfully requests that the Commission clarify that BOCs in states that have ordered intraLATA dialing parity be required to provide dialing parity for those calls that cross that state's line. In the alternative, MCI respectfully requests that the Commission reconsider this issue if it did not intend to require such result.

Respectfully submitted,

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CERTIFICATE OF SERVICE

I, Pamela Glascoe, do hereby certify that copies of the foregoing MCI Telecommunications Corporation's Petition for Clarification, or, in the Alternative, Reconsideration were sent via first class mail, postage paid, to the following on this 7th day of October, 1996.

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