



MCI Telecommunications Corporation

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OCT 16 1996

Federal Communications Commission
Office of Secretary

October 16, 1996

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

Re: CC Docket 95-116: Local Number Portability

Dear Mr. Caton:

Today, Woody Traylor, Beth Kistner and I met with Mindy Littell, Jeannie Su, and Susan McMaster of the Common Carrier Bureau. The purpose of the meeting was to review MCI's position in this proceeding. The attached material was used during the meeting and details the matters discussed.

Sincerely,


Leonard S. Sawicki

Attachment

cc: Ms. Littell
Ms. McMaster
Ms. Su

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**PETITIONS FOR RECONSIDERATION
DOCKET NO. 95-116**

ISSUES RAISED:

QOR

SCHEDULING

ILNP COST RECOVERY

MCI PETITION FOR CLARIFICATION

QOR IS *STILL* WRONG

- **No new information presented on which to base reconsideration.**
- **QOR deployed just in incumbent's network, or between consenting networks, still subjects CLEC calls to different and inferior treatment.**
- **All carriers acknowledge QOR results in more PDD for ported calls — perceptibility to end user is *not* the issue.**
- **Supposed cost savings are grossly inflated and largely unsupported.**
- **BOC claims about increased switched processor capacity don't reflect reduced demand due to customer losses.**

SCHEDULING

- **No carrier presented information that FCC schedule can't be met.**
- **Full MSA deployment is necessary to ensure open environment for competition —**
 - * **incremental addition of end offices won't substantially increase total LNP costs or resources.**
 - * **blanket waivers put burden on CLECs to make requests on office-by-office basis in 100 MSAs — non-compliance harder to monitor, enforce.**
 - * **BOCs, small LECs have waiver process available as necessary.**
 - * **FCC can grant small LEC requests for waiver if no interconnection request made by CLEC; LNP should become available immediately once interconnection agreement is in place.**

SCHEDULING (cont.)

- ***Bona fide* requests for smaller MSAs should be accepted beginning 6/1/98 and implemented beginning 1/1/99 — LECs should meet requests earlier if possible.**
- **FCC should not accept LNP delay as result of introduction of new services (e.g., AIN0.2) that aren't compatible with LRN software.**

ILNP COST RECOVERY

- **FCC clearly has jurisdiction over ILNP cost recovery.**
- **FCC's cost allocation criteria correctly address "competitive neutrality" mandate.**
- **FCC's cost allocation criteria do not prohibit LECs from recovering ILNP costs.**
- **FCC's cost allocation criteria do not result in all ILNP costs falling on incumbent LECs — FCC allocation schemes all result in proportionate allocation among local carriers.**

MCI PETITION FOR CLARIFICATION

- **Only single carrier (GTE) opposes MCI's Petition.**
- **IXCs should not pay additional transport and switching resulting from call forwarding measures.**