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October 25, 1996

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

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OCT 25 1996

Re: Ex Parte CC Docket 96-45 - Federal-State  
Joint Board On Universal Service

FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF SECRETARY

Dear Mr. Caton:

Please enclose the attached document in the above captioned proceeding. Attached is MCI's proposal for a proxy cost model workshop.

Two copies of this Notice are being submitted to the Secretary of the FCC in accordance with Section 1.1206(a)(1) of the Commission's rules.

Sincerely,

Kimberly M. Kirby

Attachment

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## **Workshop Proposal**

*MCI Communications Corporation*

A well-run workshop can be a valuable tool used to educate the staff and act as another vehicle for parties to come to closure on contested, and sometimes contentious, issues like the use of proxy cost models. However, there are steps that must be taken in order to maximize the effectiveness of the time spent especially since workshops are time-consuming and resource-intensive both for the regulators and the parties.

First, there must be clear instructions about what the workshop is to accomplish and staff must remain steadfast once committed to obtaining the particular goal. A good example of workshops that actually "work" are the Local Number Portability (LNP) workshops held in Illinois, New York, California, Georgia, and Maryland. In those workshops the participants were required to complete the task of the technical "how to" rather than attempt to create policy.

Second, the workshops that have been most successful in the past are those that are controlled by staff. Commission staff must keep the participants focused on the task at hand by leading the discussions and asking the questions. At the same time, staff must ensure that each participant has the opportunity to be heard. Thus staff must act as referee and interject if and when participants try to take over the process. Also, staff will have the advantage of updating the Commission (or Bureau management) in a timely manner and be best positioned to get resolution of an issue, or participant, that may be stalling the workshop process.

Third, there must be open access to the data and models used. A TELRIC workshop on proxy models, for instance, will not work if the ILECs maintain proprietary control over the data used to run various versions of the models.

Finally, the workshops must have a specific deadline. Workshops that are most effective are those that do not have open-ended completion dates. Otherwise there is incentive to delay the process rather than resolve the issues.