



MCI Telecommunications Corporation

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EX PARTE OR LATE FILED

Mary L. Brown
Senior Policy Counsel
Federal Law and Public Policy

ORIGINAL

August 15, 1997

William S. Caton
Acting Secretary
Federal Communications Commission
1919 M St. NW Room 222
Washington, D.C. 20554

RECEIVED

AUG 15 1997

Re: EX PARTE in CC Docket No. 97-137

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

Dear Mr. Caton:

On August 14, 1997, Jonathan B. Sallet, MCI's Chief Policy Counsel, met with Commissioner Rachel Chong to discuss the above-captioned docket. MCI stated its views that the Commission has independent authority under section 271 to define the meaning of the checklist items, for both pricing and non-pricing purposes, in the wake of the Eighth Circuit's decision in Iowa Utilities Board v. FCC.

MCI also discussed problems it has had, in the wake of Iowa Utilities, in ordering combinations of elements from incumbent local exchange carriers, including Ameritech, and requested that the Ameritech 271 order provide guidance to the industry to ensure that combinations of elements would be available. MCI also reviewed our previously-filed position on the public interest test, and stated that, among other items, the Commission should look at market structure in deciding whether grant of a particular application is in the public interest.

Sincerely,

Mary L. Brown

cc: Kathy Franco (Commissioner Chong's office)

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