identify primary residential lines once a definition was in place.[34] In that NPRM, the Commission specifically stated that ILECs "must establish criteria to identify primary lines for the purpose of determining SLC and PICC levels."[35] Unfortunately, more than five months later, the Commission has not issued an order delineating these fundamental criteria. No uniform or acceptable definition for primary residential lines has been ordered.

IXCs and long distance customers have been harmed by the ILECs' "vague" and "circular" line definitions and by their delays in providing verifiable, auditable PICC data that IXCs need, and which the Commission has required. These ILEC delays are making it difficult for long distance carriers to audit their bills and to recover their costs efficiently, requiring IXCs to recover costs based on estimates rather than actual data. To mitigate this problem, the Commission should at minimum prescribe that a line is primary if it is the only line on the IXC end user billing account (instead of the ILEC end user billing account). This definition is competitively neutral, verifiable, and easily audited since the ILEC records reveal the number of lines PIC'd to each IXC and the IXC's own systems similarly reveal which numbers are PIC'd to it.[36] Alternatively, the Commission could prescribe that primary lines be based on ILEC billing telephone number (BTN). BTN, while not as easily implemented and verifiable as a definition based on IXC end user billing accounts, is more auditable and clearer to understand than the

---

[34] In re Defining Primary Lines, CC Docket No. 97-181, Notice of Proposed Rulemaking, 12 FCC Rcd 13647 (1997)(Primary Lines NPRM).

[35] Primary Lines NPRM at 1.

[36] This method does not resolve the issue of an ILEC and IXC dispute over which customer lines are PIC'd to a particular IXC. MCI's experience is that this is a non-trivial problem, and MCI has initiated a reconciliation process with ILECs in an effort to mitigate the issue in the future. We expect this effort to be completed in late 1998.

definitions the ILECs have proposed.

The Commission should also require ILECs to populate a "class of customer" indicator on Customer Account Record Exchange (CARE) transactions for new customer notifications. CARE records currently are transmitted between the ILEC and the IXC to notify the IXC that the customer is presubscribed to it and provide customer account information to the IXC. Such information would allow the IXC to know what charge to pass on to that customer and also provide a source for verifying the ILEC charges. While MCI recognizes that this is not a perfect solution, as it only provides the information on a going-forward basis and does not address the embedded base of customers, it should nonetheless be prescribed by the Commission.

Finally, the Commission should prescribe language permitting IXCs to request an independent audit of ILEC systems used to determine and bill the PICC. This would assist IXCs in verifying PICC bills. As of today, MCI's review of line information that we have received from a few ILECs for our January access invoices reveal that there are enormous issues with the data. Among other items, MCI has found that the ILECs have billed us on the basis of invalid carrier identification codes, mis-classified customers, or have duplicated line count records. The problems are substantial, and we believe will not be quickly remedied by the ILECs. An independent audit is essential to enable us to provide the most accurate billing to the customer.

VI. The Commission Should Require ILECs to Provide IXCs Auditable Line Count Data for All Types of Lines, Or Hold The ILECS Accountable

MCI has only recently received information supporting PICC charges from some of the large ILECs. The PICC bills received from the first four large ILECs were rejected from loading

due to formatting errors. In all cases the line detail information required to support the billed amounts has not arrived with the invoice data but has been received 1-3 weeks after the invoice, resulting in unauditable bills. MCI has only just received detailed line information from GTE and Southwestern Bell. Pacific Bell sent its transmission in late January, but only delivered one bill and has not sent the missing bills even though MCI has asked for them for weeks. BellSouth has informed MCI that it will not provide the January bill or the ANI detail information to support its January PICC bills until mid-March, at which time it will back-bill MCI. Even when we obtain the ANI detail information to support the PICC bill, IXCs are in a "trust me" situation vis a vis the ILECs, since we do not have any way to verify line classifications (e.g., primary/non-primary, multi-line business, etc.) we are being charged.

First, it is unreasonable for the ILECs to bill IXCs more than one month in arrears for PICC. Such back-billing practices increase the risk that IXCs will not be able to recover their costs, given the Commission's various enforcement decisions limiting back-billing of retail customers. Thus, the Commission should prescribe that ILECs must bill PICC charges within 30 days that the costs are incurred. IXCs should not suffer and long distance customers should not be harmed as a result of ILEC billing inefficiencies.

Second, the Commission is in apparent agreement with MCI that ILECs are required to provide IXCs auditable line count data. In the Access Charge Reform Reconsideration Order, issued October 9, 1997, the Commission required the ILECs to provide IXCs with customer-specific information about the number and type(s) of PICCs they are assessing for each of the

IXC's presubscribed customers.[37] In that order, the Commission recognized that this is necessary to provide IXCs the opportunity to develop a rate structure that recovers these costs in a cost-causative manner.[38] Specifically, the Commission stated that:

> If an IXC were to receive a bill for the aggregate amount of the PICCs assessed on its presubscribed lines and did not have access to information that indicates for which lines the LEC is assessing a primary or non-primary line residential PICC, the IXC would be unable to develop residential rates that accurately reflect the underlying costs of providing service over those lines.[39]

The Commission also found that:

> ...in a multi-line business configuration, without information about the number of local business lines that are presubscribed to a particular IXC and the amount of PICCs being charged for which lines, the IXC will not be able to recover the costs of serving its customers in an efficient manner.[40]

To date, more than four months later, some ILECs still have not provided IXCs with information required by the Commission to support PICC bills, and which will allow IXCs "to recover the costs of serving its customers in an efficient manner."[41]

ILEC PICC billing practices that violate the Access Charge Reform Reconsideration Order, coupled with vague line definitions, make it impossible for IXCs to develop accurate

---

[37] Second Order on Reconsideration and Memorandum Opinion and Order, 12 FCC Rcd. 16606 (1997) (Access Charge Reform Reconsideration Order), ¶16. Currently, MCI receives information from the ILECs showing which customer lines are presubscribed to MCI. MCI has no way of determining or verifying whether that line is primary or secondary residential, multi-line or single-line business, or Centrex lines.

[38] Id.

[39] Id.

[40] Id.

[41] If IXCs are forced to collect the PICC fees on behalf of the ILECs, it is imperative that IXCs be given real time access to ILEC databases for PICC in order to respond to customer inquiries.

residential rates that reflect the distinction between primary and non-primary lines, and business rates that reflect the distinction between multi-line and single-line business lines. ILECs should not be permitted to collect the PICC from the IXCs through current charges until they can provide the PICC billing information ordered in the Access Charge Reform Reconsideration Order. The Commission should prescribe the PICC rate of zero ($0.00) until such time as the ILECs comply with the Access Charge Reform Reconsideration Order. The Commission has designated these portions of the ILEC tariffs for investigation, and therefore has clear authority to prescribe rates.[42]

If the ILECs can demonstrate that they cannot provide immediate verifiable line information to support their PICC bills due to systems limitations, and the Commission determines that is essential for ILECs to recover the PICC immediately, the Commission should hold the ILECs responsible for collection of the PICC from the end user until such time as the ILEC can provide all necessary information to the IXC in advance of billing. Under the Commission's rules, ILECs currently assess the PICC on end users that do not presubscribe to an IXC. Therefore, no new system development costs or significant additional expenses would be placed on the ILECs as a result of modification that would require ILECs to collect the PICC from the end user instead of from the IXC. Moreover, since ILECs already bill the end user for the subscriber line charge every month, it already has the information to determine whether the line is primary or non-primary residential, multi-line or single-line business. Clearly, ILECs are much better situated to collect these fees from end users than IXCs, who have been denied the information necessary to collect revenues.

---

[42] 47 U.S.C.§204.

VII. The Commission Should Immediately Determine that IXCs Can Notify ILECs of De-PIC's

On December 31, 1997, Sprint filed a Petition for Declaratory Ruling seeking a ruling that an IXC that has terminated service to a presubscribed customer for nonpayment or for violation of any other term or condition in the IXC's tariff is not liable for PICCs with respect to such customer's lines if the IXC has made a timely notification to the ILEC that it has discontinued service to the customer.[43] Just as the ILEC should accept notification from the IXC that a customer has selected that IXC as the presubscribed interexchange carrier, the ILEC should accept notification from the IXC that a customer is no longer presubscribed (PIC'd) to that IXC.

As is illustrated in Appendix B, MCI has requested that ILECs de-PIC customers for which MCI has terminated service for nonpayment or for violation of any other term or condition in MCI's tariff. As is also illustrated in Appendix B, the ILECs have refused, and will continue to assess the PICC on MCI.

As Sprint states in its petition, the Commission clearly contemplated that the PICC would be charged to IXCs only when a carrier-customer relationship exists with the end user and that the ILEC should bill the PICC directly to customers that have no presubscribed carrier. Sprint also correctly states that the Commission took this action in order to remove an end user's incentive not to presubscribe to any carrier, and thereby to avoid liability for the PICC charges that would be recovered directly or indirectly by presubscribed IXCs in their rates.[44] The case in

---

[43] Sprint Corporation Request for Declaratory Ruling Regarding Application of PICCs, CCB/CPD 98-2, filed December 31, 1997.

[44] See Access Charge Reform Order at ¶93, where the Commission noted the "customer contact value" of being the presubscribed carrier. As Sprint explains in its Petition, that value is present only if the customer has an account with the IXC.

which an IXC has terminated its relationship with the customer is no different than the one in which the customer has decided not to presubscribe its line to any carrier. In both cases, the ILEC should assess the PICC directly on the end user. Absent such a ruling, IXCs could be placed in the position of having to pay the PICC for end user lines that are presubscribed to that IXC even though no relationship exists between that IXC and customer. There would be no way for the IXC to recover the PICC charges from its former customer.

In the Access Charge Reform Reconsideration Order, the Commission recognized that accurate PICC billing is necessary for IXCs to recover their costs efficiently. Clearly, allowing an ILEC to bill an IXC a PICC for a customer with which that IXC no longer has a customer relationship is contrary to the Commission's intent. In such an instance, ILECs should bill the end user directly.

The Commission must prescribe language to be included in the ILECs' tariffs that require ILECs to de-PIC customers when notified by that customer's IXC, and require ILECs to collect the PICC from these end users directly, subject to timely notification. Absent such a presubscription, IXCs will continue to be billed PICCs with no way for the IXC to recover the PICC charge from that customer.

VIII. The Commission Should Standardize The "Snap-Shot" Date Used by ILECs to Bill PICCs

Currently, the ILECs are permitted to take a "snap shot" on a particular date to determine which customers' PICC are assigned to a particular IXC. As customers relocate, and competition develops in the local telecommunications markets, customers will, no doubt, change local phone

companies within a billing period. If ILECs do not take the "snap shot" on a standardized date, it is likely that, for the same portion of the ILECs' aggregated customer base, IXCs will be assessed PICCs by more than one ILEC for the same customer. Additionally, allowing ILECs to take "snap shots" on different dates makes it more difficult for IXCs to estimate their overall PICC costs, which they must recover through nationally averaged rates. It also needlessly increases IXC systems cost, since they must process data at different times throughout the month. Today, for example, Frontier is submitting PICC information to MCI for 30 sub-companies six different times in the month. While each sub-company appears on only one of 6 cycles, the result of the different intervals is that the IXC effort and associated costs required to handle Frontier is as great or greater than the major ILECs. It is important, therefore, that regardless of the number of sub-companies or bill cycles that an ILEC has, the Commission should prescribe that ILECs must submit a single snap-shot to IXCs, on a uniform date.

IX. The Commission Should Prescribe Tariff Language Requiring ILECs to Provide IXCs Information Supporting the Amount of Universal Service Subsidies Included In Access Charges

In the Universal Service Order, the Commission found that ILECs could recover their universal service contributions through interstate access charges. The Commission also indicated that carriers contributing to universal service could recover their contributions from interstate rates.

The Telecommunications Act of 1996 clearly requires that universal service subsidies be specific and explicit. However, the full amount of MCI's federal universal service contribution is not known because the ILECs are not itemizing the amount of interstate access charges billed to

MCI and other IXCs that is, in fact, universal service contribution. Accordingly, MCI requests that the Commission prescribe that the ILECs' access bills include a line item breaking out the amount of universal service that is passed through to IXCs in each access element.[45] Alternatively, the Commission should order the ILECs to report monthly to IXCs the percentage of revenues recovered in each basket that represents ILEC USF contributions. However, the Commission should be aware that if the ILECs do not provide information by rate element, then IXCs are entitled to allocate ILEC USF contributions to the appropriate charges for the purpose of calculating their USF retail fees.

[45] For example, the ILECs should separate the amount of universal service contributions that are recovered through PICCs from the amount recovered though carrier common line charges.

X. Conclusion

Wherefore, the Commission should adopt prescriptive measures that will ensure that access charges are quickly driven to forward-looking economic cost. Additionally, it should immediately prescribe the modifications delineated in this petition to ensure that (1) IXCs have the opportunity to recover their costs efficiently, and (2) harm to long distance consumers resulting from ILEC PICC billing delays is mitigated.

Respectfully submitted,
MCI TELECOMMUNICATIONS CORPORATION

Mary L. Brown
Don Sussman
Mary Sisak
MCI Telecommunications Corp.
1801 Pennsylvania Ave., NW
Washington, D.C. 20006
(202)-887-2551

February 24, 1998

APPENDIX A

ILEC NON-PRIMARY LINE DEFINITIONS

Effective January 1, 1998

Ameritech (Section 3.8.1.B)

"When an end user is provided with more than one local residence exchange service at the same location, only one line will be classified as Primary and all other lines are considered to be Non-Primary. One or more of the lines may be provided by the Telephone Company under the general and/or local exchange service tariffs. One or more lines may also be provided by other telecommunications provider(s) as resold exchange access.

For exchange residence service installed prior to January 1, 1998, the Telephone Company will use existing service records to determine which line is Primary. Current billing records contain Universal Service Order Codes (USOCs) and Field Identifiers (FIDs) that identify non-primary residence lines. If that data are not available, date of installation may be used. The first line installed at a location will be designated as Primary.

For exchange residence service established after January 1, 1998, if the customer orders more than one line at the same service location, the first line installed will be Primary. Otherwise, if services are ordered at different times, the date of installation for the same location may be used to designate the Primary line."

Bell Atlantic (Section 4.1.6(A))

"The EUCL and PICC Residence Subscriber rate regulations are designated as either Primary or Non-Primary. The Primary rate is assessed to the residential subscriber line which is any and all of the following:

> (1) the only line provided at that location; (2) the line designated as primary by the billed party at the point of ordering service; or (3) where the billed party has not designated a line, the first line installed. Any additional lines at the same location for the same billed party will be assessed the Non-Primary rate."

BellSouth

In the definitions section of the tariff (Section 2.6), BellSouth states that the term "primary residential local exchange service line or trunk" "denotes the Residential Local Exchange service

line or trunk provided by the Telephone Company or a reseller of Telephone Company-provided local exchange service lines or trunks which is assessed the Primary Residential PICC or EUCL Charge."

GTE (Section 13.10(B))

While no PICC-specific definition exists, GTE states the following for the EUCL:

"End user residence common line rates are applied as primary or non-primary. Primary residence end user common line rates will apply to only one line:

> When the customer has more than one line billed on a single account for the same service name at the same service address.
>
> Non-primary residence end user common line rates will apply to all residence lines which are not primary residence lines."

Nevada Bell (Section 3.8.B)

-- Same as Pacific Bell (see below)

NYNEX (Section 4.6.1)

-- Same as Bell Atlantic

Pacific Bell (Section 3.7.B)

"Each additional local exchange line provided to a specific end user at the same premises as the primary residential line in (A) above under the Telephone Company's general or local exchange Service tariffs shall be deemed to be a non-primary residential line."

SNET (Section 4.1.3.E)

"When an end user is provided a residence Telephone Exchange Service by the Telephone Company, the Primary Residence Subscriber rate set forth in Section 4.1.4(a) following applies to the first local residence exchange line. Each additional local residence exchange line will be billed the Non-Primary residence rate set forth in Section 4.1.4(d) following."

Sprint (Section 4.6.A)

"The EUCL and PICC residence subscriber rates, as described in (A) and (B) following are assessed on a Primary and Non-Primary basis. The primary rate is assessed to the first line in the residence. Any additional lines at the same residence for the same billing party will be assessed the non-primary rate."

SWBT (Section 3.3.B)

"For each local exchange service provided as a non-primary residential service, the Non-Primary Residential charge applies to each line."

U S West (Section 4.6.A)

"The EUCL and PICC Residence Subscriber rates, as described in B., C., and I. following, are based on a Primary and Non-Primary basis. The Primary Residence rate is assessed for the first line provided at a residence. Each additional line at the same residence, regardless of the named subscriber, is assessed the Non-Primary Residence rate. If the primary line disconnects, the non-primary line with the greatest length of service becomes the primary line. A residence is defined as a self-contained housing unit that typically contains cooking and sleeping facilities."

APPENDIX B

LETTERS TO AND FROM ILECS REGARDING DE-PICC

MCI Telecommunications Corporation
707 17th Street
Suite 4200
Denver, CO 80202

January 21, 1998

Ms. Pam Lee
Director
Bell South
1960 W. Exchange Place, Suite 420
Tucker, GA 30084

Dear Pam:

This letter constitutes MCI's formal request to have Bell South support processes to permit MCI to un-pic its former customers at the RBOC switch level. Specifically, MCI requests that Bell South support the TCSI 0205-Order Cancellation-WTN only-by AC process.

MCI requests that this process be made available so that MCI may initiate the complete removal of an MCI PIC designation for former customers who are disconnected by MCI for financial or other reasons, or customers who have requested disconnection in communications directly with MCI but have not followed up by contacting Bell South and requesting a new primary interexchange carrier. We require this process, in part, so that PICC payment and assessment issues are properly handled

This is a matter of significant urgency for MCI. We request that you provide a written response to our request, including a project implementation date, by no later than January 28, 1998. Other local exchange carriers have already made this process available, and we expect that Bell South should be able to provide this functionality on or before March 31, 1998

Thank you for your prompt attention to this issue.

Sincerely,

Robbie

Robbie L. Rutstein
Director
Mass Markets
Order Processing

MCI Telecommunications Corporation
707 17th Street
Suite 4200
Denver, CO 80202

January 21, 1998

Mr. David Vaughn
General Manager
Southwestern Bell
Four Bell Plaza, Room 660
Dallas, TX 75202

Dear Dave:

This letter constitutes MCI's formal request to have Southwestern Bell support processes to permit MCI to un-pic its former customers at the RBOC switch level. Specifically, MCI requests that Southwestern Bell support the TCSI 0205-Order Cancellation-WTN only-by AC process.

MCI requests that this process be made available so that MCI may initiate the complete removal of an MCI PIC designation for former customers who are disconnected by MCI for financial or other reasons, or customers who have requested disconnection in communications directly with MCI but have not followed up by contacting Southwestern Bell and requesting a new primary interexchange carrier. We require this process, in part, so that PICC payment and assessment issues are properly handled.

This is a matter of significant urgency for MCI. We request that you provide a written response to our request, including a project implementation date, by no later than January 28, 1998. Other local exchange carriers have already made this process available, and we expect that Southwestern Bell should be able to provide this functionality on or before March 31, 1998.

Thank you for your prompt attention to this issue.

Sincerely,

Robbie

Robbie L. Rutstein
Director
Mass Markets
Order Processing

MCI Telecommunications
Corporation
707 17th Street
Suite 4200
Denver, CO 80202

MCI

January 21, 1998

Ms. Kathy Flynn-Miles
Account Vice President
Pacific Bell
370 3rd Street, Room 301
San Francisco, CA 94107

Dear Kathy:

This letter constitutes MCI's formal request to have Pacific Bell support processes to permit MCI to un-pic its former customers at the RBOC switch level. Specifically, MCI requests that Pacific Bell support the TCSI 0205-Order Cancellation-WTN only-by AC process.

MCI requests that this process be made available so that MCI may initiate the complete removal of an MCI PIC designation for former customers who are disconnected by MCI for financial or other reasons, or customers who have requested disconnection in communications directly with MCI but have not followed up by contacting Pacific Bell and requesting a new primary interexchange carrier. We require this process, in part, so that PICC payment and assessment issues are properly handled.

This is a matter of significant urgency for MCI. We request that you provide a written response to our request, including a project implementation date, by no later than January 28, 1998. Other local exchange carriers have already made this process available, and we expect that Pacific Bell should be able to provide this functionality on or before March 31, 1998.

Thank you for your prompt attention to this issue.

Sincerely,

Robbie

Robbie L. Rutstein
Director
Mass Markets
Order Processing

MCI Telecommunications Corporation
707 17th Street
Suite 4200
Denver, CO 80202

January 21, 1998

Ms. Jasmine Espy
MCI Account Team Director
US West
1801 California St., Suite 2210
Denver, CO 80202

Dear Jasmine

This letter constitutes MCI's formal request to have US West support processes to permit MCI to un-pic its former customers at the RBOC switch level. Specifically, MCI requests that US West support the TCSI 0205-Order Cancellation-WTN only-by AC process.

MCI requests that this process be made available so that MCI may initiate the complete removal of an MCI PIC designation for former customers who are disconnected by MCI for financial or other reasons, or customers who have requested disconnection in communications directly with MCI but have not followed up by contacting US West and requesting a new primary interexchange carrier. We require this process, in part, so that PICC payment and assessment issues are properly handled.

This is a matter of significant urgency for MCI. We request that you provide a written response to our request, including a project implementation date, by no later than January 28, 1998. Other local exchange carriers have already made this process available, and we expect that US West should be able to provide this functionality on or before March 31, 1998.

Thank you for your prompt attention to this issue.

Sincerely,

Robbie L. Rutstein
Director
Mass Markets
Order Processing

MCI Telecommunications
Corporation

707 17th Street
Suite 4200
Denver, CO 80202

January 21, 1998

Mr. David W. Swan, Jr
Vice President
Bell Atlantic South
Operations Carrier Services
2980 Fairview Park Drive, 10th Floor
Falls Church, VA 22042

Dear David:

This letter constitutes MCI's formal request to have Bell Atlantic South support processes to permit MCI to un-pic its former customers at the RBOC switch level. Specifically, MCI requests that Bell Atlantic South support the TCSI 0205-Order Cancellation-WTN only-by AC process.

MCI requests that this process be made available so that MCI may initiate the complete removal of an MCI PIC designation for former customers who are disconnected by MCI for financial or other reasons, or customers who have requested disconnection in communications directly with MCI but have not followed up by contacting Bell Atlantic South and requesting a new primary interexchange carrier. We require this process, in part, so that PICC payment and assessment issues are properly handled.

This is a matter of significant urgency for MCI. We request that you provide a written response to our request, including a project implementation date, by no later than January 28, 1998. Other local exchange carriers have already made this process available, and we expect that Bell Atlantic South should be able to provide this functionality on or before March 31, 1998.

Thank you for your prompt attention to this issue.

Sincerely,

Robbie

Robbie L. Rutstein
Director
Mass Markets
Order Processing

MCI Telecommunications
Corporation
707 17th Street
Suite 4200
Denver, CO 80202

January 21, 1998

Ms. Pat Gonzales-Perez
Director Carrier Systems-External Systems
Bell Atlantic North
375 Pearl Street, Room 1501
New York, NY 10038

Dear Pat:

This letter constitutes MCI's formal request to have Bell Atlantic North support processes to permit MCI to un-pic its former customers at the RBOC switch level. Specifically, MCI requests that Bell Atlantic North support the TCSI 0205-Order Cancellation-WTN only-by AC process.

MCI requests that this process be made available so that MCI may initiate the complete removal of an MCI PIC designation for former customers who are disconnected by MCI for financial or other reasons, or customers who have requested disconnection in communications directly with MCI but have not followed up by contacting Bell Atlantic North and requesting a new primary interexchange carrier. We require this process, in part, so that PICC payment and assessment issues are properly handled.

This is a matter of significant urgency for MCI. We request that you provide a written response to our request, including a project implementation date, by no later than January 28, 1998. Other local exchange carriers have already made this process available, and we expect that Bell Atlantic North should be able to provide this functionality on or before March 31, 1998.

Thank you for your prompt attention to this issue.

Sincerely,

Robbie

Robbie L. Rutstein
Director
Mass Markets
Order Processing

MCI Telecommunications
Corporation
707 17th Street
Suite 4200
Denver, CO 80202

January 21, 1998

Ms. Carol Ostrander
Director-Sales
Southern New England Telephone
530 Preston Avenue
Meriden, CT 06450

Dear Carol:

This letter constitutes MCI's formal request to have Southern New England Telephone support processes to permit MCI to un-pic its former customers at the RBOC switch level. Specifically, MCI requests that Southern New England Telephone support the TCSI 0205-Order Cancellation-WTN only-by AC process.

MCI requests that this process be made available so that MCI may initiate the complete removal of an MCI PIC designation for former customers who are disconnected by MCI for financial or other reasons, or customers who have requested disconnection in communications directly with MCI but have not followed up by contacting Southern New England Telephone and requesting a new primary interexchange carrier. We require this process, in part, so that PICC payment and assessment issues are properly handled

This is a matter of significant urgency for MCI. We request that you provide a written response to our request, including a project implementation date, by no later than January 28, 1998. Other local exchange carriers have already made this process available, and we expect that Southern New England Telephone should be able to provide this functionality on or before March 31, 1998.

Thank you for your prompt attention to this issue.

Sincerely,

Robbie

Robbie L. Rutstein
Director
Mass Markets
Order Processing

MCI Telecommunications Corporation
707 17th Street
Suite 4200
Denver, CO 80202

January 21, 1998

Ms. Lori Sofianek
Director Carrier Alliance
Rochester Telephone
180 South Clinton Avenue
New York, NY 14646

Dear Lori:

This letter constitutes MCI's formal request to have Rochester Telephone support processes to permit MCI to un-pic its former customers at the RBOC switch level. Specifically, MCI requests that Rochester Telephone support the FCSI 0205-Order Cancellation-WTN only-by AC process.

MCI requests that this process be made available so that MCI may initiate the complete removal of an MCI PIC designation for former customers who are disconnected by MCI for financial or other reasons, or customers who have requested disconnection in communications directly with MCI but have not followed up by contacting Rochester Telephone and requesting a new primary interexchange carrier. We require this process, in part, so that PICC payment and assessment issues are properly handled.

This is a matter of significant urgency for MCI. We request that you provide a written response to our request, including a project implementation date, by no later than January 28, 1998. Other local exchange carriers have already made this process available, and we expect that Rochester Telephone should be able to provide this functionality on or before March 31, 1998.

Thank you for your prompt attention to this issue.

Sincerely,

Robbie

Robbie L. Rutstein
Director
Mass Markets
Order Processing

MCI Telecommunications
Corporation
707 17th Street
Suite 4200
Denver, CO 80202

January 21, 1998

Mr. Jeffrey Ulm
Vice President, MCI Account Team
Ameritech
2000 West Ameritech Center Dr., Room 2G94
Hoffman Estates, IL 60196

Dear Jeff:

This letter constitutes MCI's formal request to have Ameritech support processes to permit MCI to un-pic its former customers at the RBOC switch level. Specifically, MCI requests that Ameritech support the TCSI 0205-Order Cancellation-WTN only-by AC process.

MCI requests that this process be made available so that MCI may initiate the complete removal of an MCI PIC designation for former customers who are disconnected by MCI for financial or other reasons, or customers who have requested disconnection in communications directly with MCI but have not followed up by contacting Ameritech and requesting a new primary interexchange carrier. We require this process, in part, so that PICC payment and assessment issues are properly handled.

This is a matter of significant urgency for MCI. We request that you provide a written response to our request, including a project implementation date, by no later than January 28, 1998. Other local exchange carriers have already made this process available, and we expect that Ameritech should be able to provide this functionality on or before March 31, 1998

Thank you for your prompt attention to this issue.

Sincerely,

Robbie

Robbie L. Rutstein
Director
Mass Markets
Order Processing

MCI Telecommunications
Corporation
707 17th Street
Suite 4200
Denver, CO 80202

January 21, 1998

Mr. Ross Marsh, Director
Carrier Account Management
Sprint Ltd.
2330 Shawnee Mission Parkway
Westwood, KS 66205

Dear Ross:

This letter constitutes MCI's formal request to have Sprint support processes to permit MCI to un-pic its former customers at the RBOC switch level. Specifically, MCI requests that Sprint support the TCSI 0205-Order Cancellation-WTN only-by AC process.

MCI requests that this process be made available so that MCI may initiate the complete removal of an MCI PIC designation for former customers who are disconnected by MCI for financial or other reasons, or customers who have requested disconnection in communications directly with MCI but have not followed up by contacting Sprint and requesting a new primary interexchange carrier. We require this process, in part, so that PICC payment and assessment issues are properly handled.

This is a matter of significant urgency for MCI. We request that you provide a written response to our request, including a project implementation date, by no later than January 28, 1998. Other local exchange carriers have already made this process available, and we expect that Sprint should be able to provide this functionality on or before March 31, 1998.

Thank you for your prompt attention to this issue.

Sincerely,

Robbie

Robbie L. Rutstein
Director
Mass Markets
Order Processing

Bell Atlantic Network Services, Inc.
2980 Fairview Park Drive
10th Floor
Falls Church, Virginia 22204
703 645-1010 Fax 703 645-3216

David W. Swan, Jr.
Vice President - Operations
Carrier Services

February 4, 1998

Ms. Robbie L. Rutstein, Director
MCI Telecommunications Corporation
Mass Markets - Order Processing
707 17th Street
Suite 4200
Denver, CO 80202

Dear Robbie:

This letter is in response to your request to have Bell Atlantic North implement a process to permit MCI to un-PIC customer, when MCI decides to sever its relationship with those customers.

Bell Atlantic's position is contained in the letter dated November 21, 1997, attached to "Sprint Corporation's Request for Declaratory Ruling Regarding Application of PICCs", currently in front of the FCC. Bell Atlantic intends to wait until the FCC rules in this matter.

Please feel free to contact me in the future for any other matter.

Sincerely,

Attachment

cc: P. González-Perez
T. Young