

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

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

In the Matter of)
)
Petition of LCI Telecom Corp.)
for Declaratory Rulings)

CC Docket No. 98-5

REPLY COMMENTS OF MINDSPRING ENTERPRISES, INC.

MindSpring Enterprises, Inc. ("MindSpring"), by its undersigned counsel, submits the following Reply Comments in response to the Petition of LCI International Telecom Corp. ("LCI") for Expedited Declaratory Rulings (the "Petition"). MindSpring, a publicly traded company (NASDAQ: MSPG), is a national Internet access provider offering subscribers a complete and easy-to-use Internet access solution. As such, both MindSpring and its subscribers have a strong interest in the rapid, Nationwide deployment of advanced telecommunications services and capabilities, including high-bandwidth digital access line services that will allow greatly improved Internet access for residential and small business customers.

MindSpring agrees strongly with the comments of Level 3 Communications, Inc. in this proceeding. The Bell operating companies currently have an effective monopoly over local loop facilities, and thereby impose both a physical bottleneck and a bandwidth bottleneck on service providers who seek access to residential and small business premises. Understandably, these companies as currently structured have no particular interest in or motivation to make it easier for unaffiliated companies to use these facilities, because the Bell companies themselves seek to preserve and expand their market share in both the local exchange and Internet access service markets. Therefore, MindSpring supports the proposals of Level 3 (as well as the similar views of

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MCI, WorldCom, and other commenting parties) for the Commission to explore regulatory alternatives that would either require or encourage restructuring of the Bell companies, and perhaps other large incumbent LECs, to separate their bottleneck facilities from their competitive businesses.

Respectfully submitted,

A handwritten signature in cursive script, appearing to read "Russell M. Blau", is written over a solid horizontal line.

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CERTIFICATE OF SERVICE

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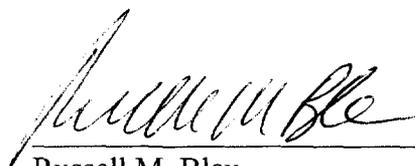
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