

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554

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JUN 15 1998

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

In the Matter of)	
)	
Implementation of the)	
Telecommunications Act of 1996:)	CC Docket No. 96-115
)	
Telecommunications Carriers' Use)	
of Customer Proprietary Network)	
Information and Other Customer)	
Information)	
)	
Implementation of the)	
Non-Accounting Safeguards of)	CC Docket No. 96-149
Sections 271 and 272 of the)	
Communications Act of 1934, as)	
Amended)	

MOTION TO EXCEED PAGE LIMITATION

MCI Telecommunications Corporation (MCI), pursuant to Section 1.48(b) of the Rules, 47 C.F.R. § 1.48(b), hereby requests permission to exceed the page limitation set forth in Section 1.429(f) of the Commission's Rules, 47 C.F.R. § 1.429(f), applicable to oppositions to petitions for reconsideration. Good cause exists for MCI's request, and MCI should be permitted to file a single opposition to other parties' petitions for reconsideration of the Second Report and Order in these dockets (Order)¹ that exceeds 25 pages in length.

As might have been expected from such a controversial, lengthy and complex proceeding, the Order, which implements the protections accorded by Section 222 of the Communications Act for

¹ Second Report and Order and Further Notice of Proposed Rulemaking, FCC 98-27 (released Feb. 26, 1998).

customer proprietary network information (CPNI), elicited 26 petitions for reconsideration in addition to MCI's petition. Most of those petitions seek to weaken the rules promulgated in the Order, contrary to MCI's interests and the interests of competitive carriers generally.

Under Section 1.429(f) of the Rules, MCI may file an opposition of 25 pages in length to each of the 26 other petitions. Rather than file separate oppositions, with the duplication attendant thereto, however, MCI instead plans to address all of the issues in a single pleading. Although MCI has only just begun the drafting of its opposition, it has already become evident that the multiplicity and complexity of the issues raised in the 26 other petitions will require a combined opposition on behalf of MCI totaling considerably more than 25 pages.

MCI accordingly requests that the Commission permit MCI to exceed the page limitation applicable to its forthcoming opposition to other parties' petitions for reconsideration, now due on June 25, 1998. A single pleading would allow MCI to organize its arguments in a way that eliminates any duplication, thus minimizing the total length of its opposition(s) to the petitions and thereby facilitating the Commission's review of the issues and minimizing the burden on the Commission and all parties. Such a single pleading thus would help the Commission craft a regulatory regime that would implement Section 222 in a way that advances the competitive and other goals of that

provision, based on as complete a record as possible.

WHEREFORE, in view of the preferability of a single combined pleading to multiple redundant pleadings, MCI submits that good cause has been demonstrated to exceed the page limitation set forth in Section 1.429(f) of the Commission's Rules governing oppositions to petitions for reconsideration. MCI accordingly requests that the Commission accept its opposition to other parties' petitions for reconsideration, to be filed on June 25, 1998, notwithstanding that it is expected to exceed 25 pages.

Respectfully Submitted,

MCI TELECOMMUNICATIONS CORPORATION

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Its Attorneys

Dated: June 15, 1998

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FEDERAL COMMUNICATIONS COMMISSION
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ORDER

Adopted:

Released:

By the Chief, Enforcement Division:

1. On June 15, 1998, MCI Telecommunications Corporation (MCI) filed a Motion to Exceed Page Limitation, requesting that it be permitted to file a single opposition to other parties' petitions for reconsideration of the Second Report and Order in these dockets (Order)¹ exceeding the page limitation set forth in Section 1.429(f) of the Commission's Rules applicable to oppositions to petitions for reconsideration.

2. Having reviewed MCI's Motion, any oppositions thereto, and the other parties' petitions for reconsideration of the

¹ Second Report and Order and Further Notice of Proposed Rulemaking, FCC 98-27 (released Feb. 26, 1998).

Order, the Commission now

ORDERS that MCI's Motion be granted and that MCI be permitted to file a single opposition to other parties' petitions for reconsideration of the Order exceeding the page limitation of 25 pages set forth in Section 1.429(f) of the Commission's Rules.

FEDERAL COMMUNICATIONS COMMISSION

Dorothy Attwood
Chief, Enforcement Division
Common Carrier Bureau

Certificate of Service

I, Carol Johnson-Stringer, do hereby certify that a true copy of the Motion to Exceed Page Limitation of MCI Telecommunications Corporation was served this 15th day of June, 1998 by hand delivery or first class mail, postage prepaid, upon each of the following parties:

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