



**MCI Communications Corporation**

1801 Pennsylvania Avenue, NW  
Washington, DC 20006  
202 887 2048

**Leonard S. Sawicki**  
Director  
FCC Affairs

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MAY 12 1998  
FEDERAL COMMUNICATIONS COMMISSION

August 11, 1998

Ms. Magalie Roman Salas  
Secretary  
Federal Communications Commission  
Room 222  
1919 M Street NW  
Washington, D.C. 20554

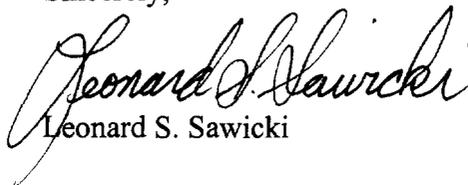
Re: RM-9108: Billing and Collection Services Provided by Local Exchange Carriers for Non-Subscribed Interexchange Services

Dear Ms. Salas:

On August 11, Mary Brown, Michael Polandick and I met with Dorothy Attwood, Brian Benison, Glenn Reynolds, and Larry Strickling of the Common Carrier Bureau. MCI reviewed its petition, the market for casual calling (non-subscribed interexchange services) and the record of the proceeding. MCI emphasized the need for an FCC rulemaking to adopt an appropriate non-discrimination rule that can be equally applied to ILEC and CLEC casual billing. If a LEC terminates billing and collection services to unaffiliated non-subscribed services providers, the LEC may not be permitted to continue to provide that service to itself or its affiliates. Furthermore, no LEC should be allowed to provide itself with billing and collection on more favorable terms than it provides to others. MCI pointed out that such a rule would be based on the FCC's Title I jurisdiction.

Please add this letter and the enclosed copy to the record of this proceeding.

Sincerely,

  
Leonard S. Sawicki

cc: Ms. Attwood  
Mr. Benison  
Mr. Reynolds  
Mr. Strickling

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