

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

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

In the Matter of :

Joint Petition for Agreement with Designation of Rural Company)
 Eligible Telecommunications Carrier Service Areas at the)
 Exchange Level Filed by Washington Utilities and Transportation)
 Commission, Asotin Telephone Company, CenturyTel of Cowiche,)
 Ellensburg Telephone Company, CenturyTel of Washington,)
 Hat Island Telephone Company, Hood Canal Telephone Co., Inc.,) CC Docket No. 96-45
 Inland Telephone Company, Kalama Telephone Company,) DA 98-1691
 Lewis River Telephone Company, Mashell Telecom, Inc.,)
 McDaniel Telephone Company, Pend Oreille Telephone Company,)
 Pioneer Telephone Company, St. John, Co-operative Telephone And)
 Telegraph Company, Tenino Telephone Company. The Toledo)
 Telephone Co., Inc., United Telephone Company of the Northwest.)
 Western Wahkiakum County Telephone Company. Whidbey)
 Telephone Company, and Yelm Telephone Company)

REPLY COMMENTS

MCI WorldCom, Inc. (MCI WorldCom) hereby responds to the comments filed by GTE in connection with the above-captioned Petition for Agreement filed by the Washington Utilities and Transportation Commission (WUTC) and twenty rural telecommunications companies.

GTE urges the Commission not to grant the WUTC's petition unless GTE's operations in Washington are also included in the waiver.¹ GTE has certified to the Commission that its operations in Washington are rural, on the grounds that it serves fewer than 100,000 lines in Washington. The Commission's rules and the Telecommunications Act of 1996 state that a company is rural if the "local exchange carrier operating entity" meets one of several criteria, one of which is the 100,000 line threshold on which GTE relies. However, neither

¹ GTE Comments at 4.

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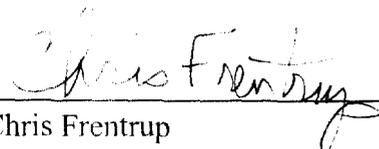
the Commission's rules nor the Act specify what an "operating entity" is. GTE interprets it to mean the company study area (COSA), or the LEC's operations within a state. GTE's operating company for ARMIS reporting and other purposes before the Commission, however, is GTE Northwest, which includes GTE's operations in Washington, Idaho, and northern California. Based on the data GTE submitted with its comments, this operating entity has more than 100,000 lines, which would mean that GTE is not rural.² Thus, at the very least, whether GTE is a rural company is an open question which raises many issues that the Commission has not yet resolved.³ The Commission should not extend the waiver beyond that requested by the WUTC until it resolves those issues.

Based on the foregoing, MCI WorldCom urges the Commission to deny GTE's request to amend the WUTC Petition to include GTE Northwest's Contel Washington study area as "rural."

Respectfully submitted

MCI WorldCom, Inc.

By:


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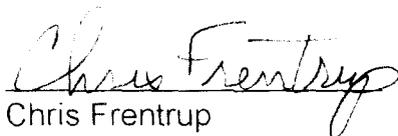
Dated: September 28, 1998

² GTE Comments, at Exhibit 1.

³ Although the Commission allowed the LECs to self-certify their rural status, it has made no final determination as to the correctness of that certification.

STATEMENT OF VERIFICATION

I have read the foregoing and, to the best of my knowledge, information, and belief, there is good ground to support it, and it is not interposed for delay. I verify under penalty of perjury that the foregoing is true and correct. Executed on September 28, 1998.

A handwritten signature in cursive script that reads "Chris Frentrup".

Chris Frentrup
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CERTIFICATE OF SERVICE

I, Sylvia Chukwuocha, do hereby certify that copies of the foregoing Reply Comments of MCI WorldCom were sent, on this 28th day of September, 1998, via first-class mail, postage pre-paid, to the following:

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