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

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FEDERAL COMMUNICATIONS COMMISSION
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In re Request of)	
)	
MCI Communications Corporation)	
British Telecommunications plc)	File No. ISP-93-013
)	
Joint Petition for Declaratory)	
Ruling Concerning Section 310(b)(4))	
and (d) of the Communications Act of)	
1934, as amended)	
)	
In the Matter of)	
)	
The Merger of MCI Communications)	GN Docket No. 96-245
Corporation and)	
British Telecommunications plc)	

Petition for Declaratory Ruling

MCI WorldCom, Inc. ("MCI WorldCom") hereby submits a petition for a declaratory ruling with respect to the reporting requirements imposed on MCI Communications Corporation ("MCI") in the above-captioned proceeding as a result of the past investment in MCI by British Telecommunications plc ("BT").¹ In light of the recent merger of MCI and WorldCom, Inc.,² we ask the Commission to confirm that these requirements are no longer relevant, necessary or in the public interest, and thus do not apply to MCI WorldCom.

In its decision approving BT's investment in MCI, the Commission imposed various reporting requirements on MCI because of the "unique aspects" of the

¹ The Commission also required MCI to maintain complete records on the provisioning and maintenance of network facilities and services it procures from BT. MCI WorldCom also requests that this requirement be eliminated.

² See *In the Matter of Application of WorldCom, Inc. and MCI Communications Corporation for Transfer of Control of MCI Communications Corporation to WorldCom, Inc., Memorandum Opinion and Order*, CC Docket No. 97-211, FCC 98-225 (rel. September 14, 1998). ("MCIWorldCom Order").

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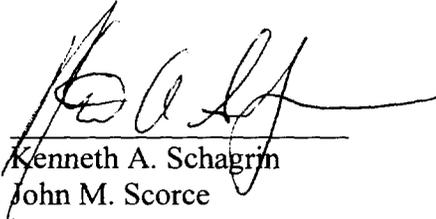
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investment.³ Specifically, the Commission required MCI to file certain reports and agreements pertaining to the U.S.-U.K route and MCI's relationship with BT.⁴ Upon consummation of the merger between MCI and WorldCom, Inc., however, BT ended its "unique" relationship with MCI by redeeming its entire shareholding interest in MCI for cash. As a result, BT no longer has an investment in MCI nor in the combined MCI WorldCom.

As a consequence, the Commission's concerns, as articulated in *BT/MCI I* and *BT/MCI II*,⁵ are no longer pertinent. In light of that fact, MCI WorldCom requests the Commission to issue a declaratory ruling to that all requirements imposed on MCI because of the past investment by BT are no longer relevant and therefore do not apply to MCI WorldCom.

Respectfully submitted,

MCI WorldCom, Inc.



Kenneth A. Schagrin
John M. Scorce

1717 Pennsylvania Ave., NW
Washington, D.C. 20006
(202) 721-2584
Its Attorneys

October 21, 1998

³ *MCI Communications Corp. and British Telecommunications plc, Declaratory Ruling and Order*, 9 FCC Rcd 3960 ("BT/MCI I"). ¶ 39.

⁴ *Id.* at ¶¶ 64-71.

⁵ *The Merger of MCI Communications Corporation and British Telecommunications plc, Memorandum Opinion and Order*, 12 FCC Rcd 15351 (1997) ("BT/MCI II")

CERTIFICATE OF SERVICE

I, Crystal Y. Dixon, do hereby certify that on the 22nd day of October, 1998, a true copy of the foregoing MCI WorldCom Petition for Declaratory Ruling was delivered, either by hand or First-Class mail, to the following:

Regina Keeney*
Chief, International Bureau
Federal Communications Commission
Room 830
2000 M Street, N.W.
Washington, D.C. 20554

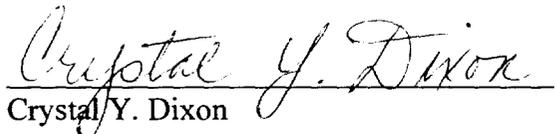
Diane J. Cornell*
Chief, Telecommunications Division
International Bureau
Federal Communications Commission
Room 838
2000 M Street, N.W.
Washington, D.C. 20554

Troy Tanner*
Chief, Policy and Facilities Branch
Telecommunications Division
International Bureau
Federal Communications Commission
Room 840
2000 M Street, N.W.
Washington, D.C. 20554

Joanna S. Lowry*
Assistant Branch Chief
Policy and Facilities Branch
Federal Communications Commission
Room 845
2000 M Street, N.W.
Washington, D.C. 20554

Susan O'Connell*
International Bureau
Federal Communications Commission
Room 834
2000 M Street, N.W.
Washington, D.C. 20554

* hand delivered


Crystal Y. Dixon