

**Before the  
Federal Communications Commission  
Washington, D.C. 20554**

<b>In the Matter of</b>	)	
	)	
<b>1998 Biennial Regulatory Review --</b>	)	
<b>Streamlined Contributor Reporting</b>	)	<b>CC Docket No. 98-171</b>
<b>Requirements Associated with Administration</b>	)	)
<b>of Telecommunications Relay Services, North</b>	)	
<b>American Numbering Plan, Local Number</b>	)	
<b>Portability, and Universal Service Support</b>	)	
<b>Mechanisms</b>	)	
	)	

**MCI WORLDCOM, INC.  
REPLY COMMENTS  
CONSOLIDATED DATA COLLECTION PROCEDURES  
AND COST ALLOCATION METHODOLOGY**

In its Notice to the above-captioned proceeding the Commission asked parties to comment on whether the cost allocation methodology proposed by the joint submission of administrators of the long-term local number portability, number administration, telecommunications relay services, and universal service support mechanisms (Joint Submission) will lead to an equitable apportionment among the administrators.<sup>1</sup> The Commission also sought

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<sup>1</sup>Public Notice, Common Carrier Bureau Seeks comment on Data collection Procedures for Telecommunications Reporting Worksheet, Docket No. 98-171, DA 99-2545, October 12, 1999.

comment on the request by the Universal Service Administrative Company (USAC) to be designated as the entity responsible for unified data collection for these programs. Three parties, MCI WorldCom, Inc. (“MCI WorldCom”), the Cellular Telecommunications Industry Association (“CTIA”), and the National Exchange Carrier association, Inc, (“NECA”) filed comments. MCI WorldCom takes this opportunity to respond to their recommendations.

CTIA is the only party other than MCI WorldCom to address the cost allocation issue. CTIA supports the allocation proposed in the Joint Submission, but notes that “other methodologies may provide a more precise allocation of cost to each program....” CTIA rejects more precise methods, maintaining that they would require costly and lengthy analysis.<sup>2</sup> MCI WorldCom’s allocation is more precise, but does not require costly or lengthy negotiations. It would simply require a different, more accurate, division of costs among the funds.<sup>3</sup> MCI WorldCom therefore recommends the Commission adopt its allocation method and allocate 62.5% of costs to the Universal Service Administrative Company (“USAC”) and 12.5% to each of the remaining fund administrators.

None of the parties supported the Joint Submission proposal to make USAC the data collection agent (“DCA”). CTIA did not rule out the possibility that USAC could become the DCA, but recommended this be the result of winning a competitive bid. Neither MCI WorldCom, nor NECA supported the notion that USAC should emerge as the sole DCA, even after a

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<sup>2</sup>CTIA Comments at 3.

<sup>3</sup>MCI WorldCom Comments at 2.

competitive bid process. Given the lack of any support for the Joint Submission's proposal for USAC to be designated as the DCA, it is clear the Commission should reject the Joint Submission's recommendation. Especially telling is the apparent unwillingness of NECA to accept the DCA role outlined for it by USAC. MCI WorldCom continues to believe USAC should focus its administrative efforts on improving the administration of the Schools and Libraries Program and the Rural Health Care Program, and abstain from data collection duties. However, NECA's proposal to share the duties of data administration among each administrator would achieve a similar goal of minimizing imposition of additional administrative effort on USAC. MCI WorldCom therefore supports NECA's recommendation.

Respectfully submitted,  
MCI WorldCom, Inc.

Lawrence Fenster

Lawrence Fenster  
MCI WorldCom, Inc.  
1801 Pennsylvania Ave., NW  
Washington, DC 20006  
(202) 887-2180

December 9, 1999

## 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 December 9, 1999

Respectfully submitted,  
MCI WorldCom, Inc.

Lawrence Fenster

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Lawrence Fenster  
1801 Pennsylvania Ave., N.W.  
Washington, D.C. 20006  
202-887-2180

## Service List

I, Barbara Nowlin, do hereby certify that a copy of MCI WorldCom's Comments has been sent by United States first class mail, postage prepaid, hand delivery, to the following parties on this 9<sup>th</sup> day of December, 1999.

Scott Bergmann\*  
Federal Communications Commission  
The Portals  
445 12<sup>th</sup> St., S.W., Rm. 6-A261  
Washington, D.C. 20554

D. Scott Barash  
USAC  
2120 L St., N.W.  
Suite 600  
Washington, DC 20037

Richard Askoff  
NECA  
100 S. Jefferson Road  
Whippany, NJ 07981

Andrea Williams  
CTIA  
1250 Connecticut Ave., NW  
Suite 800  
Washington, DC 20036

\* Hand Delivered

Barbara Nowlin

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Barbara Nowlin