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March 27, 2000

Magalie Roman Salas
Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

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MAR 27 2000

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

Re: IB Docket No. 98-192
Direct Access to the INTELSAT System

Dear Ms. Salas:

In my letter to you dated March 17, 2000, I described efforts by MCI WorldCom, Inc. ("MCI WorldCom") to secure for itself certain capacity on the INTELSAT system that is under contract to COMSAT Corporation ("COMSAT"). Notwithstanding the FCC's denial of MCI WorldCom's request for "portability" in the *Direct Access Order*, ¶¶ 126-128, MCI WorldCom is now engaged in a self-help portability scheme. As described in my earlier letter, MCI WorldCom has initiated a practice of submitting disconnect orders to COMSAT for certain circuits and then continuing to transmit on those circuits after the disconnect date. Among other things, this prevents COMSAT from selling the circuits to competitors of MCI WorldCom that might be interested in the capacity.

Despite COMSAT's objections, MCI WorldCom has continued to engage in this practice. Accordingly, COMSAT has sent the attached letter, notifying MCI WorldCom that it will be billed at COMSAT's tariffed monthly rate for any circuit that it continues to occupy after an announced disconnect date.

Respectfully submitted,

Howard D. Polsky

cc: Donald Abelson
James Ball
Douglas Webbink
Michael McCoin
Cathy Hsu
Robert S. Koppel

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March 24, 2000

Mr. Paul Bates
Vice President, International Networks Engineering
MCI WorldCom
2400 North Glenville Drive
Richardson, TX 75082

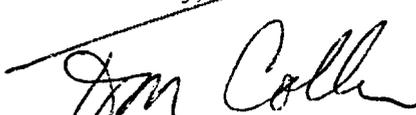
Dear Paul,

Paul, as we discussed on Tuesday, March 21, 2000, MCI WorldCom has formally submitted disconnect orders to COMSAT, but has continued to transmit on those carriers after the disconnect date. During our conversation, you committed to resolve this issue. However, MCI WorldCom has not resolved this issue and continues to transmit on COMSAT's capacity without renewing its service order.

Last month, MCI WorldCom began this practice which is a violation of CWS's tariff. In a letter addressed to you dated February 3, 2000, I brought this matter to your attention for immediate resolution. MCI WorldCom has now continued this practice despite your assurances that this would not continue, and COMSAT must apply its tariff and charge MCI WorldCom the monthly rate. Attached is invoice number I0039001 for four (4) carriers which MCI WorldCom has not disconnected according to its order.

There are several other disconnect orders that MCI WorldCom has submitted. Please be advised that if MCI WorldCom continues to transmit on those circuits past the disconnect date, the monthly rate will apply, unless MCI WorldCom agrees to a longer service term before the disconnect date.

Sincerely,

A handwritten signature in cursive script that reads "Tom Collins".

Tom Collins



INVOICE

Invoice No:
Invoice Date:

10039001
March 21, 2000

MCI WORLDCOM
ATTN: INTERNATIONAL COST CENTER
500 CLINTON CENTER DRIVE
BLDG 2, FLOOR 3
CLINTON MS 39056
UNITED STATES



INVOICE

Invoice No:
Invoice Date:

10039001
March 21,2000

Payments by Check:

CWS NATIONSBANK LOCKBOX
COMSAT WORLD SYSTEMS
POST OFFICE BOX 65763
CHARLOTTE NC 28265

Payments by Wire Transfer:

CWS CITIBANK ZBA
CITIBANK
NEW YORK NY
Acct # 40583466
ABA 021000089

Customer No:
Payment Terms:
Due Date:

S153
Net 30
April 20,2000

Customer:

MCI WORLDCOM
ATTN: INTERNATIONAL COST CENTER
500 CLINTON CENTER DRIVE
BLDG 2, FLOOR 3
CLINTON MS 39056
UNITED STATES

Address Changes/Inquiries:

COMSAT WORLD SYSTEMS
CONTROLLER'S OFFICE
6560 ROCK SPRING DRIVE
BETHESDA MD 20817
Telephone: (301) 214-3486
Facsimile: (301) 214-7100

AMOUNT DUE: 70,790.00 USD

Amount Remitted

Please include remittance advice with payment or fax to: (301) 214-7100

Original

Line	Description	Net Amount
1	FRACTIONAL CHARGES FOR SVO# 75119,75583,75070 AND 75069 CIRCUITS -WHICH ARE DEACTIVATED BUT STILL OPERATING. PLEASE SEE ATTACHED DETAIL	70,790.00
Subtotal:		70,790.00
AMOUNT DUE:		70,790.00

