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ORIGINAL

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EX PARTE OR LATE FILED

May 3, 2000

VIA HAND DELIVERY

Ms. Magalie Roman Salas, Secretary
Federal Communications Commission
Office of the Secretary - Room TWB-204
445 Twelfth Street, SW
Washington, DC 20554

ORIGINAL

Re: Ex Parte Submission: CC Docket No. 98-121

Dear Ms. Salas:

Yesterday, Karen Kinard, John Jackson, De O'Roarke, Jerry Epstein, and I, on behalf of MCI WorldCom, spoke with Jake Jennings, Daniel Shiman, John Stanley, Eric Einhorn, Raj Kannan, Andre Rausch and Alex Belinfante of the Common Carrier Bureau. We discussed our concerns with BellSouth's most recent proposal for a performance remedy plan, VSEEM III. The issues we addressed included the following:

- BellSouth's plan has insufficient remedies
- The plan's statistical methodology would allow BellSouth discriminatory performance without consequence
- The plan fails to attach remedies to several key metrics
- Several of the metrics included in the plan lack sufficient disaggregation
- The benchmarks are unsatisfactory
- There are still a number of issues that need to be resolved concerning metric definitions and calculations

Attached are graphs and charts that were used during the discussion regarding the statistical methodology.

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Please include this filing in the record of the above-referenced proceeding. Two copies of this Notice are being submitted in accordance with Section 1.1206 of the Commission's rules.

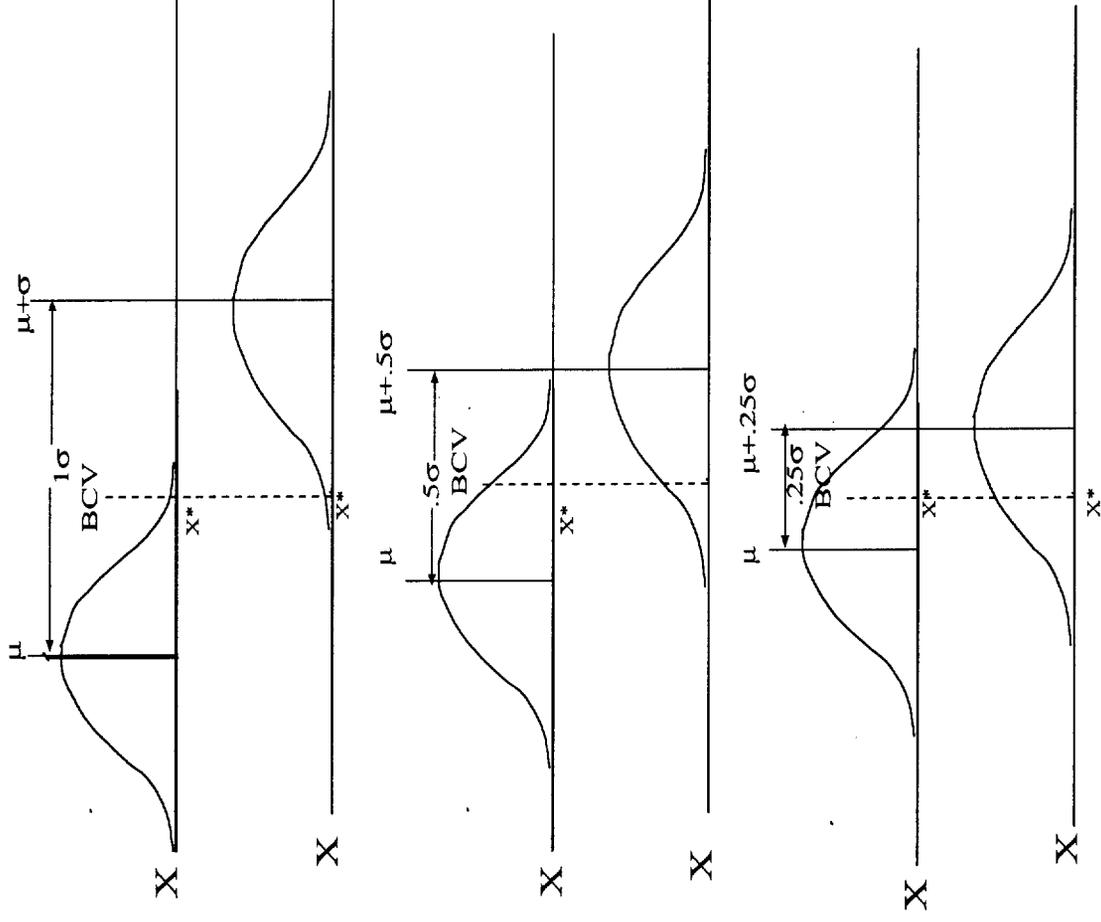
Sincerely,


Karen Reidy

Attachments

cc: Jake Jennings
Daniel Shiman
John Stanley
Eric Einhorn
Raj Kannan
Andre Rausch
Alex Belinfante

Graphs of Deltas Effect on Critical Value



Values of BCV and Level of Significance, for Various Sample Sizes

$\delta=1$ yields:

$$\begin{aligned}n_C = 50 &\Rightarrow \text{BCV} = -3.54 \Rightarrow \alpha = \beta = .0002 \\n_C = 100 &\Rightarrow \text{BCV} = -5.00 \Rightarrow \alpha = \beta = .0000003 \\n_C = 300 &\Rightarrow \text{BCV} = -8.66 \Rightarrow \alpha = \beta = 2.3 \cdot 10^{-16} \\n_C = 500 &\Rightarrow \text{BCV} = -11.18 \Rightarrow \alpha = \beta = 2.5 \cdot 10^{-28} \\n_C = 1000 &\Rightarrow \text{BCV} = -15.81 \Rightarrow \alpha = \beta = 1.3 \cdot 10^{-54}\end{aligned}$$

$\delta=0.5$ yields:

$$\begin{aligned}n_C = 50 &\Rightarrow \text{BCV} = -1.77 \Rightarrow \alpha = \beta = .038 \\n_C = 100 &\Rightarrow \text{BCV} = -2.50 \Rightarrow \alpha = \beta = .0062 \\n_C = 300 &\Rightarrow \text{BCV} = -4.33 \Rightarrow \alpha = \beta = .000007 \\n_C = 500 &\Rightarrow \text{BCV} = -5.59 \Rightarrow \alpha = \beta = .00000001 \\n_C = 1000 &\Rightarrow \text{BCV} = -7.91 \Rightarrow \alpha = \beta = 1.3 \cdot 10^{-13}\end{aligned}$$

$\delta=0.25$ yields:

$$\begin{aligned}n_C = 50 &\Rightarrow \text{BCV} = -0.88 \Rightarrow \alpha = \beta = .19 \\n_C = 100 &\Rightarrow \text{BCV} = -1.25 \Rightarrow \alpha = \beta = .106 \\n_C = 300 &\Rightarrow \text{BCV} = -2.16 \Rightarrow \alpha = \beta = .015 \\n_C = 500 &\Rightarrow \text{BCV} = -2.80 \Rightarrow \alpha = \beta = .0026 \\n_C = 1000 &\Rightarrow \text{BCV} = -3.95 \Rightarrow \alpha = \beta = .00004\end{aligned}$$