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June 15, 2000

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FEDERAL COMMUNICATIONS COMMISSION
WASHINGTON, D.C. 20554

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

Re.: **CC Docket No. 90-571** - *Ex Parte* Response to Late-Filed Comments of Worldcom, Inc., TRS Fund Administration Fund Size Estimate and Payment Formula, July 2000 Through June 2001,

Dear Ms. Salas:

The National Exchange Carrier Association, Inc. (NECA) hereby submits (2) copies of this *ex parte* response, in the above-captioned proceeding, to Comments of Worldcom, Inc. (Worldcom), which were filed late.¹ NECA herein corrects the record with respect to certain of Worldcom's statements and assertions.

NECA is not planning an additional data request for July 2000, nor does NECA plan to modify its proposed TRS provider reimbursement rate.² (See Worldcom Comments at note 4.) Worldcom apparently misread NECA's statement concerning a March 17, 2000 request for additional TRS provider data. Subsequent to release of the Commission's March 6, 2000 TRS Order,³ which authorized reimbursement for speech-to-speech (STS) and video relay

¹ See Worldcom, Inc. Comments, TRS Fund Administration Fund Size Estimate and Payment Formula, July 2000 Through June 2000, CC Docket No. 90-571, filed June 5, 2000. Worldcom requested that the Commission accept its late-filed comments. NECA was not served with a copy of Worldcom's Comments. Thus, because they were filed very near the due date for Reply comments (June 9, 2000), NECA was unable to submit a timely reply.

² *Id.* at note 4.

³ See Telecommunications Relay Services and Speech-to-Speech Services for Individuals With Hearing and Speech Disabilities, CC Docket No. 98-67, *Report and Order and Further Notice of Proposed Rulemaking*, 15 FCC Rcd 5140 (2000) (TRS Order).

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interpreting (VRI), NECA offered providers an opportunity to update information originally submitted in July 1999.⁴

In its comments, Worldcom requested that the Commission waive its existing rules and reimburse STS and VRI calls based upon session minutes instead of conversation minutes.⁵ NECA has no data that would support this change at this time.

Finally, Worldcom requested that the Commission inquire whether cost estimates for VRI included video relay equipment located somewhere other than at relay centers, and, if not, to authorize NECA to issue another data request to include such costs for purposes of increasing the provider reimbursement rate.⁶ In reviewing the data provided in response to its request, NECA verified that each provider submitting VRI cost estimates included only costs associated with relay centers.

In accordance with Section 1.1206(a)(1) of the Commission's rules, two copies of this *ex parte* response are being submitted to your office for filing in the above-referenced proceeding. Additionally, a copy has been provided to the International Transcription Service (ITS).

Acknowledgment of receipt of this *ex parte* response is requested. A duplicate letter is provided for this purpose.

Sincerely,

Regina McNeil (REF)

CC: Al McCloud, Network Services Division
Debra Sabourin, Network Services Division
Les Selzer, Network Services Division
ITS
Larry Fenster, Worldcom, Inc.

⁴ On May 28, 1999, NECA requested data necessary to size the TRS fund and to set the provider reimbursement rate, with a response due July 15, 1999, to prepare for the October 1, 1999 annual TRS filing. NECA asked for STS and VRI data at that time because the TRS *Order* had been anticipated for some time. NECA and the Interstate TRS Advisory Council were concerned about developing a TRS reimbursement rate that would include the increased cost of providing these services, should the Commission authorize their reimbursement from the interstate TRS Fund. After the Commission moved the filing deadline to May 1, 2000, NECA again asked providers for data (on October 27, 1999), with a response due January 2000. After the March 6 release of the TRS *Order*, NECA sent an electronic mail message to providers (March 17, 2000), enumerating several requirements that could impact providers' costs, and again requested STS and VRI information.

⁵ See Worldcom Comments at 3.

⁶ *Id.* at 4.

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