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Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554

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In the Matter of)
)
Policies and Rules Concerning)
Unauthorized Changes of)
Consumers Long Distance Carriers)
)
Reseller CIC Codes)

CC Docket No. 94-129

WORLDCOM REPLY COMMENTS

WorldCom, Inc. (WORLDCOM) respectfully submits these comments in reply to initial comments filed in response to the Common Carrier Bureau's Public Notice¹ requesting supplemental comments on the proposal that resellers obtain their own carrier identification codes (CICs).

The evidence presented in the initial supplemental comments confirms that mandating all resellers to obtain individual CICs would impose a substantial cost on resellers,² and potentially on other carriers as well.³ As the Association of Communications Enterprises (ASCENT) noted, a "carrier generating annual revenues of \$5 or \$10 million in a highly competitive environment which produces slim profit margins cannot withstand the burden associated with a \$500,000 or \$1 million or \$2

¹ Public Notice, Common Carrier Bureau Asks Parties to Refresh the Record and Seeks Additional Comment on Proposal to Require Resellers to Obtain Carrier Identification Codes, CC Docket No. 94-129 (May 17, 2000).

² AT&T estimates full nationwide deployment to cost at least \$2 million. AT&T Supplemental Comments, pp. 5-6. *See also*, ASCENT Supplemental Comments, pp. 9-17. *See also*, WorldCom Supplemental Comments, p. 5. *See also*, GTE Supplemental Comments, p. 5. *See also*, Sprint Supplemental Comments, p. 2. *See also*, GVNW Consulting Supplemental Comments, p.9.

³ *See* AT&T Supplemental Comments, pp. 4-5; *See also* GTE Supplemental Comments, p. 4. *See also*, USTA Supplemental Comments, pp. 7-9, n. 8. *See also*, Bell Atlantic Supplemental Comments, p. 4.

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million governmentally-mandated expenditure and remain financially and competitively viable.”⁴

Additionally, numerous parties advocate that the Commission refrain from adopting costly, additional measures for the purpose of curbing slamming until currently adopted measures become effective and the results are evaluated.⁵ Based on the complaints WorldCom has been served by the Commission, it appears the number of unauthorized conversion complaints involving its resellers has declined approximately 50% this year relative to a corresponding time period last year.⁶ This demonstrates the appropriateness of allowing time for the already adopted measures to address any concern that the Commission has regarding soft slams.

Two of the commenters imply that resellers are precluded from being chosen as the preferred carrier in split-PIC situations.⁷ GNVW Consulting claims that underlying facilities-based carriers failed to develop their automatic number identification (ANI) databases in manner that supports and recognizes the potential for there to be one carrier for interLATA toll presubscription and another carrier for intraLATA toll presubscription. Rather, they say, the ANI database can only support a single long distance provider per line, and therefore, if two different carriers were selected for the same line, all of the call detail records ("CDRs") would be forwarded to only one of the two carriers.⁸

⁴ Ascent Supplemental Comments, p. 14.

⁵ See, GTE Supplemental Comments, pp. 5-7. See also, USTA Supplemental Comments, p. 9. See also, Bell Atlantic Supplemental Comments, pp. 2-4. See also, AT&T Supplemental Comments, pp. 6-7. See also, ASCENT Supplemental Comments, p. 24-5. See also, WorldCom Supplemental Comments, pp. 2 and 9-10.

⁶ AT&T appears to have a similar experience. See AT&T Supplemental Comments, pp. 6-7 “[F]or the first five months of this year the monthly average number of complaints regarding its resellers reported to AT&T – including, but not limited to, complaints of “soft slamming” -- was less than 20 percent the average monthly number of such complaints during the corresponding period of 1999.”]

⁷ Sprint Supplemental Comments, p. 5. GNVW Consulting Supplemental Comments, pp. 5-6.

⁸ GNVW Supplemental Comments, pp. 5-6.

WorldCom's provisioning and billing systems, however, support the ability of one reseller being the interLATA toll carrier while another reseller is the intraLATA toll carrier, regardless of whether these resellers have an individual CIC or share WorldCom's CIC. WorldCom systems are able to break down the CDR for a line on a jurisdictional basis and forward it to the appropriate carrier.

In conclusion, as supported by the majority of initial supplemental comments, the Commission should not require resellers to obtain individual CICs.

Respectfully submitted,

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June 20, 2000

Certificate of Service

I, Vivian Lee, do hereby certify that copies of the foregoing Comments In the Matter of Policies and Rules Concerning Unauthorized Changes of Consumers Long Distance Carriers, Reseller CIC Codes were sent via first class mail, postage paid, to the following on this 13th day of June, 2000.

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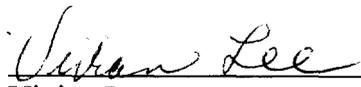
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