

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

In the Matter of)	
)	
Telecommunications Relay Services)	CC Docket No. 98-67
and Speech-to-Speech Services for)	
Individuals with Hearing and Speech)	
Disabilities)	

**COMMENTS
WORLD COM, INC.**

Introduction

On November 9, 2000, the National Exchange Carrier's Association (NECA), submitted guidelines for cost recovery in response to additional services and improved quality of service standards the Commission adopted in its March 6, 2000 "Advanced Services Order."¹ WorldCom takes this opportunity to comment NECA's proposed cost recovery guidelines.

¹Telecommunications Relay Services and Speech-to-Speech Services for Individuals with Hearing and Speech Disabilities, Report and Order and Further Notice of Proposed Rulemaking, CC Docket 98-96, 15 FCC Rcd 5140 (2000), Released March 6, 2000.

Speech to Speech and Video Relay Services

NECA proposes maintaining a nationally averaged rate for all telecommunications relay services (TRS), except for speech-to-speech (STS), video relay service (VRS). NECA proposes having relay operators report STS and VRS expenses and minutes of use separately so it may calculate a separate rate for each of these services. NECA notes that although the costs associated with these services fall within existing capital and expense accounts, and therefore do not require a new model of cost recovery, they do have significantly different costs that justify setting a separate reimbursement rate.²

WorldCom concurs with this conclusion. STS has significantly higher labor costs, and VRS will have significantly higher labor and capital costs than other relay services. It is likely that these services will always have higher than average unit costs. Because some relay operators may not provide either of these services, the Commission should maintain separate reimbursement for these two services.³ If the Commission were to establish a single reimbursement rate for all TRS services, operators providing STS and VRS would be undercompensated, and those not providing these services would be overcompensated.

²TRS Cost Recovery Guidelines, "Guidelines," NECA, November 9, 2000, at 6 and 8.

³STS will be provided on a regional basis, so some relay operators may not provide STS. VRS is voluntary, and again, some relay operators will not provide this service.

900 # Calls

NECA proposes determining the interstate share of 900 # call minutes by using a methodology similar to the one it adopted to allocate 800# call minutes to the interstate jurisdiction.⁴ WorldCom supports this proposal.

Spanish to Spanish

NECA proposes to collect costs and minutes associated with Spanish to Spanish service separately, and reimburse separately if the unit costs differ significantly from the nationally average rate for other TRS services.⁵ WorldCom supports this proposal.

Cost Increases Between December 18, 2000 and June 2001

⁴*Id.*, at 4.

⁵*Id.*, at 5.

NECA notes that operators may face higher costs during the July 1999 to June 2000 time period if they comply with the Commission's new requirements.⁶ As the Commission is aware, some relay operators have requested waivers from the new requirements until the next funding year is in effect.⁷ If the Commission approves these waivers, these operators will not face higher costs during the December 18, 2000 to June 2001 period. Operators that will comply on time will be penalized during this interim period. WorldCom proposes the Commission allow operators that have complied with the Commission's December 18, 2000 deadline to be reimbursed at a higher rate. WorldCom proposes the Commission direct NECA to immediately request data from complying carriers that will permit it to estimate the additional unit cost of compliance until the next funding year begins. Once carriers certify they are in compliance, they will be permitted to be reimbursed at the higher compliance rate for the period December 18, 2000 to June 2001. This action will reward carriers that have incurred the additional cost to comply with the new requirements on time, and will incent those carriers requesting waivers to come into compliance at the earliest possible time.

For the reasons discussed above, WorldCom urges the Commission to adopt its recommendations.

Respectfully submitted,

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⁶*Id.*, at 4.

⁷See e.g., *Motion for a Temporary Waiver*, Sprint, CC Docket 98-96, November 7, 2000.

Washington, DC 20006

January 5, 2001

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.

January 5, 2001

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