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Richard S. Whitt  
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March 22, 2001

Magalie Roman Salas  
Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street, S.W.  
Suite TW-A325  
Washington, D.C. 20554

**RECEIVED**

**MAR 22 2001**

FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

Re: Ex Parte Presentation in CC Docket Nos. 99-68; 96-98

Dear Ms. Salas:

On March 21<sup>st</sup>, 2001, Mary Brown and Richard Whitt of WorldCom, Inc. met with Deena Shetler and Sarah Whitesell, legal advisors to Commissioner Tristani, to discuss the issue of reciprocal compensation for ISP-bound traffic. The meeting focused on issues covered in previous filings submitted by WorldCom in the above-referenced proceeding, including why the Commission lacks jurisdiction over ISP-bound traffic under Section 201 of the Communications Act. We also discussed various aspects of the proposals pending before the Commission, stressing that: (1) "bill and keep" is prohibited by the Telecommunications Act, (2) there is a lack of demonstrated need for any form of growth cap on inbound traffic, and (3) so-called "evergreen" contracts should be considered existing agreements under any proposal.

Pursuant to Section 1.206(b)(2) of the Commission's Rules, an original and one copy of this letter are being provided to you for inclusion in the above-referenced proceedings.

Sincerely,

Richard S. Whitt

cc: Deena Shetler  
Sarah Whitesell