

LAWLER, METZGER & MILKMAN, LLC

1909 K STREET, NW
SUITE 820
WASHINGTON, D.C. 20006
PHONE (202) 777-7700
FACSIMILE (202) 777-7763

March 11, 2002

EX PARTE

William F. Caton
Acting Secretary
Federal Communications Commission
Room TW-A325
445 Twelfth Street, S.W.
Washington, DC 20554

Re: *2000 Biennial Regulatory Review; Separate Affiliate Requirement of Section 64.1903 of the Commission's Rules, CC Docket No. 00-175*

Dear Mr. Caton:

On March 7, 2002, Mary Brown and the undersigned, on behalf of WorldCom, Inc., met with Michelle Carey, Thomas Navin, Donald Stockdale, Claudia Pabo, Brad Koerner, Pamela Megna, and Jack Yachbes to discuss issues pending before the Commission in the above-captioned docket. WorldCom stressed the importance of structural (such as separate affiliate) and non-structural (such as provisioning standards) safeguards in preventing anticompetitive practices by incumbent LECs that provide in-region long distance services.

Pursuant to Section 1.1206(b)(2) of the Commission's rules, 47 C.F.R. § 1.1206(b)(2), a copy of this letter is being filed electronically for inclusion in the public record of the above-captioned proceeding.

Sincerely,

/s/ A. Richard Metzger, Jr.
A. Richard Metzger, Jr.

cc: Michelle Carey
Thomas Navin
Donald Stockdale
Claudia Pabo