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September 10, 2002

K. Dane Snowden
Chief
Consumer & Governmental Affairs Bureau
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

Re: Informal Complaints Alleging General Disputes
and Unauthorized Conversions
In re WorldCom, Inc., No 02-13533-AJG (Bankr. S.D.N.Y.)
WC Docket No. 02-215

Dear Mr. Snowden:

As you know, WorldCom, Inc. and its US subsidiaries filed petitions for relief under Chapter 11 of the Bankruptcy Code on July 21, 2002. I write with respect to the implications of the bankruptcy filing on informal complaints filed pursuant to sections 1.718 and 1.719 of the Commission's Rules against MCI Telecommunications Corporation, MCI WorldCom Network Services and MCI WorldCom Communications, Inc. (the "Company") filed by former customers seeking credit for events prior to July 21, 2002. 47 C.F.R. §§ 1.718, 1.719. Complaints where credits are owed to former customers for post-petition events (i.e., unauthorized conversions or general disputes such as billing errors that occurred on or after July 21, 2002) generally are not affected by the bankruptcy filing and we will continue to respond to them in the ordinary course.

Currently, the Bankruptcy Court has given the Company authorization to credit current customers on prepetition disputes. The Company is handling these issues in the ordinary course. However, the bankruptcy filing precludes the Company from making payment on claims that arose prior to the petition date, unless authorized by the Bankruptcy Court. Furthermore, section 362(a) of the Bankruptcy Code, 11 U.S.C. § 362(a), automatically stays the commencement or continuation of any proceeding against the debtor that was or could have been commenced prior to the filing of the bankruptcy petition. Notwithstanding these bankruptcy principles, the Company would like to

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continue to issue credits to former customers (i.e., unauthorized conversions or disputes that occurred before July 21, 2002) in the same manner that it did prior to the bankruptcy filing.

To this end, the Company shortly will be filing a motion with the Bankruptcy Court seeking to modify the automatic stay to permit it to continue issuing credits to former customers who have alleged prepetition events. We will seek authorization from the Bankruptcy Court to issue credits or make payments to former customers to resolve prepetition disputes or unauthorized conversions. We anticipate it will take approximately one month for the Bankruptcy Court to consider and rule on this motion. As a result, the Company seeks an extension of time to respond fully to complaints where credits are owed to former customers where the alleged dispute or unauthorized conversion occurred prepetition. The Company will continue to respond fully and issue credits where appropriate to complaints filed by current customers and former customers who have alleged post-petition disputes or unauthorized conversions.

Our undertaking to seek a modification of the automatic stay by the Bankruptcy Court and authorization for payments are only for the purposes specifically set forth herein. Except as provided herein, the Company reserves all rights and remedies under the Bankruptcy Code or any other law, and the position taken herein shall be without prejudice to any position the Company has taken, or may in the future take, with respect to any other matter.

We appreciate the Commission's patience as we analyze the implications of the bankruptcy filing on our customer complaint resolution procedures. Please do not hesitate to contact me with any questions.

Sincerely,

Kecia Boney Lewis

cc: Margaret Egler, Deputy Bureau Chief, Consumer & Governmental Affairs Bureau
Thomas Wyatt, Deputy Bureau Chief, Consumer & Governmental Affairs Bureau
Jeffrey Carlisle, Senior Deputy Bureau Chief, Wireline Competition Bureau
John Rogovin, Deputy General Counsel, Office of General Counsel
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