

Before the

FEDERAL COMMUNICATIONS COMMISSION RECEIVED

Washington, D.C. 20554

SEP 10 2002

FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

In the Matter of )  
Petition of WorldCom, Inc. Pursuant to Section 252(e)(5) )  
of the Communications Act for Expedited Preemption )  
of the Jurisdiction of the Virginia State Corporation ) CC Docket No. 00-218  
Commission Regarding Interconnection Disputes with )  
Verizon Virginia Inc., and for Expedited Arbitration )

In the Matter of )  
Petition of Cox Virginia Telecom, Inc., Pursuant to )  
Section 252(e)(5) of the Communications Act for ) CC Docket No. 00-249  
Preemption of the Jurisdiction of the Virginia State )  
Corporation Commission Regarding )  
Interconnection Disputes with Verizon Virginia Inc. )  
and for Arbitration )

In the Matter of )  
Petition of AT&T Communications of Virginia Inc., )  
Pursuant to Section 252(e)(5) of the ) CC Docket No. 00-251  
Communications Act for Preemption of the )  
Jurisdiction of the Virginia Corporation )  
Commission Regarding Interconnection Disputes )  
With Verizon Virginia Inc. )

**WORLDCOM'S MOTION SEEKING LEAVE TO EXCEED PAGE LIMIT FOR  
OPPOSITION TO PETITION FOR CLARIFICATION AND RECONSIDERATION**

WorldCom, Inc. ("WorldCom") respectfully seeks leave to exceed the 25-page limit applicable to an Opposition to a Petition for Reconsideration pursuant to 47 C.F.R. § 1.106(g). WorldCom's Opposition to Verizon's Petition For Clarification and Reconsideration of July 17, 2002 Memorandum Opinion and Order is filed concurrently herewith. In light of the length and content of Verizon's Petition, WorldCom's request is reasonable and will cause no prejudice to Verizon.

On August 16, 2002 Verizon filed its Petition for Clarification and Reconsideration of some of the issues resolved in the Wireline Competition Bureau's 369-page Memorandum Opinion and Order, which was released on July 17, 2002.<sup>1</sup> Concurrent with its Petition, Verizon filed a motion to exceed the twenty five page limit that would ordinarily apply to petitions for reconsideration. Verizon's Petition was approximately forty pages long, and included a new factual declaration from a Verizon witness, as well as arguments that Verizon had not previously presented to the Bureau.<sup>2</sup> Given the length of Verizon's submission, and the fact that it raised arguments that WorldCom had no previous opportunity to address, Verizon cannot legitimately claim to be burdened or prejudiced if WorldCom's motion is granted.

**WHEREFORE**, WorldCom respectfully requests that it be permitted to exceed the 25-page limit and that its accompanying Opposition to Petition for Clarification and Reconsideration be accepted for filing and considered on its merits.

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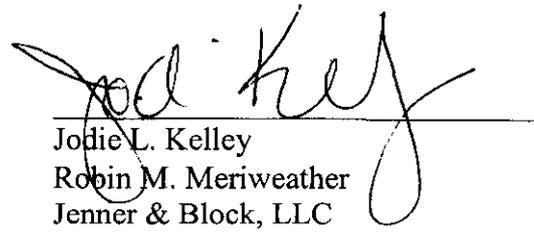
<sup>1</sup> *In re Petition of WorldCom, Inc. Pursuant to Section 252(e) of the Communications Act for Preemption of the Jurisdiction of the Virginia State Corporation Commission Regarding Interconnection Disputes with Verizon Virginia Inc., and for Expedited Arbitration*, CC Docket No. 00-218, *In the Matter of Petition of Cox Virginia Telcom, Inc., Pursuant to Section 252(e)(5) of the Communications Act for Preemption of the Jurisdiction of the Virginia State Corporation Commission Regarding Interconnection Disputes with Verizon-Virginia, Inc. and for Arbitration*, CC Docket No. 00-249, *In the Matter of Petition of AT&T Communications of Virginia Inc., Pursuant to Section 252(e)(5) of the Communications Act for Preemption of the Jurisdiction of the Virginia Corporation Commission Regarding Interconnection Disputes with Verizon Virginia Inc.*, CC Docket No. 00-251, Memorandum Opinion and Order ¶ 1 (rel. July 17, 2002) ("Order").

<sup>2</sup> As discussed in the accompanying Opposition, Verizon's belated presentation of those new factual assertions is procedurally improper, and unlawful, and must be rejected.

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Respectfully submitted,

A handwritten signature in black ink, appearing to read "Jodie L. Kelley", is written over a horizontal line. The signature is fluid and cursive.

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**CERTIFICATE OF SERVICE**

I hereby certify that true and accurate copies of the foregoing Motion Seeking Leave To Exceed Page Limit For Opposition To Petition For Clarification And Reconsideration were delivered this 10th day of September, 2002, by email and in the manner indicated below to:

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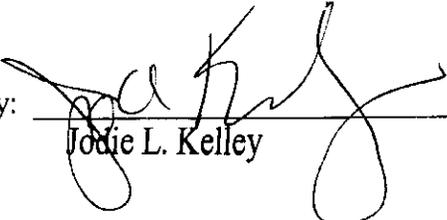
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By:   
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