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February 13, 2003

BY ELECTRONIC DELIVERY

Marlene H. Dortch, Secretary
Federal Communications Commission
445 Twelfth Street, S.W.
Washington, D.C. 20554

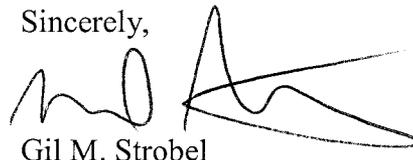
Re: Ex Parte Presentation, Review of the Section 251
Unbundling Obligations of Incumbent Local Exchange
Carriers, CC Docket Nos. 01-338, 96-98, 98-147

Dear Ms. Dortch:

On February 13, 2003, Donna Sorgi, Vice President of Federal Advocacy for WorldCom and A. Richard Metzger, Jr., counsel for WorldCom, met with Jordan Goldstein, Senior Legal Advisor to Commissioner Copps and Lisa Zaina, Senior Legal Advisor to Commissioner Adelstein. During the meeting, WorldCom expressed views consistent with WorldCom's written submissions in the above-captioned docket, including the need for the Commission to repeal the current commingling rules and use restrictions applicable to loop-transport combinations. WorldCom also expressed support for the proposal advanced by the National Association of Regulatory Utility Commissioners (NARUC) in a February 6, 2003 *ex parte* filing as a reasonable compromise.¹ Although the NARUC proposal differs from WorldCom's position in this proceeding, on balance it offers a sound and lawful approach to the "impairment" issue. In addition, WorldCom stressed the importance of maintaining competitive local exchange carriers' (LECs') access to incumbent LEC facilities in order to foster competition for the provision of advanced services to residential customers.

Pursuant to the Commission's rules, this letter is being provided to you for inclusion in the public record of the above-referenced proceeding.

Sincerely,



Gil M. Strobel

cc: Jordan Goldstein
Lisa Zaina

¹ NARUC, *UNE Triennial Review: Principles and Standards for State Commissions*, filed with *ex parte* letter of James B. Ramsey, NARUC General Counsel (Feb. 6, 2003).