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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, left voicemail messages for Christopher Libertelli, Legal Advisor to Chairman Powell for wireline competition matters and Matthew Brill, Senior Legal Advisor to Commissioner Abernathy. In these messages, Ms. Sorgi urged the Commission not to delay reconsideration of its current "interim" rules restricting the use of enhanced extended links (EELs) and the commingling of unbundled network elements (UNEs) and special access services. As WorldCom has explained in previous filings, the need to resolve the problems with the current rules is especially pressing now that the Bell Operating Companies (BOCs) have received authorization to provide in-region, inter-LATA services, making them not only suppliers of key inputs, but also competitors in the long distance business. If the Commission does not eliminate the use restrictions entirely, it should, at a minimum, eliminate any commingling restrictions and avoid any standard that requires carriers to measure local usage. As Ms. Sorgi explained, the commingling rules in particular have prevented WorldCom and other local service providers from using unbundled loops and transport to carry local traffic.

Ms. Sorgi subsequently spoke with Mr. Brill by telephone. During that conversation, Ms. Sorgi stressed the importance to competitive carriers, such as WorldCom, that have deployed DSL assets, of obtaining access to incumbent local exchange carrier unbundled network elements that are needed to offer broadband services.

Marlene H. Dortch  
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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,

A handwritten signature in black ink, appearing to read 'Gil M. Strobel', with a long horizontal stroke extending to the right.

Gil M. Strobel

cc: Matthew Brill  
Christopher Libertelli