



Scott A. Shefferman
Associate Counsel
International Affairs
Law & Public Policy

1133 19th Street, NW
Washington, DC 20036
Tel: 202-736-6064
Fax: 202-736-6083
scott.shefferman@wcom.com

March 7, 2003

Ms. Marlene Dortch
Secretary
Federal Communications Commission
445 12th Street, SW
Room TWB-204
Washington, DC 20554

Re: Petitions for Protection From Whipsawing on the U.S.-Philippines Route –
IB Docket No. 03-38

Dear Ms. Dortch:

The attached letter provides WorldCom rate information that was requested by the International Bureau. WorldCom hereby requests confidential treatment for the information contained in the letter. We are filing a redacted copy of the letter for the public file in this proceeding.

Confidentiality Request

The attached letter contains non-public commercially sensitive information regarding WorldCom's aggregated consumer rate data that would not normally be disclosed to third parties. Accordingly, WorldCom requests that this information be kept confidential and withheld from public inspection pursuant to the Freedom of Information Act, 5 U.S.C. § 522(b), and sections 0.457 and 0.459 of the Commission's rules, 47 C.F.R. §§ 0.457, 0.459.

One electronic copy of this Notice is being filed with the Secretary of the Federal Communications Commission in accordance with Section 1.1206 of the Commission's rules. Should you have any questions, please do not hesitate to contact the undersigned.

Sincerely,

A handwritten signature in black ink, appearing to read "Scott A. Shefferman", with a long horizontal line extending to the right.

Scott A. Shefferman

cc: Lisa Choi
Mark Urestsky
Don Ableson
Jackie Ruff
Samuel Feder
Jennifer Manner
Paul Margie
Barry Ohlson
Bryan Tramont
James Talbot, AT&T
Thomas Leuba, Sullivan & Cromwell
Henry Goldberg, Goldberg, Godles, Wiener & Wright
Patricia Paoletta, Wiley Rein & Fielding



Scott A. Shefferman
Associate Counsel
International Affairs
Law & Public Policy

1133 19th Street, NW
Washington, DC 20036
Tel: 202-736-6064
Fax: 202-736-6083
scott.shefferman@wcom.com

March 7, 2003

Ms. Marlene Dortch
Secretary
Federal Communications Commission
445 12th Street, SW
Room TWB-204
Washington, DC 20554

PUBLIC FILE COPY

EX PARTE

Re: Petitions for Protection From Whipsawing on the U.S.-Philippines Route –
IB Docket No. 03-38

Dear Ms. Dortch:

Mark Uretsky and Lisa Choi of the International Bureau have requested information regarding WorldCom's collection rate trends for International Direct Dial calls to the Philippines over the past several years. In this letter we are providing the requested information. In the attached confidentiality request, WorldCom seeks confidential treatment for the information contained herein.

The following Table A shows WorldCom's international calling plan (ICP) rates and total rate effective in January of each year for the period 1998 through 2003. International calling plan rates represent discount rates that are applicable to the vast majority of WorldCom's customers. The "total rate" column shows the blended per minute average of WorldCom's Basic and ICP rates for the period 1998 through 2003. The rates are for consumer mass markets international direct dialed calls, and exclude operator-assisted, collect, and calling card calls:

Ms. Marlene Dortch

March 7, 2003

Page 2

Table A--

Average Rate Per Minute Declines

| | ICP Rate | Total Rate |
|------|---------------------|------------|
| | ----- | ----- |
| 1998 | | |
| 1999 | | |
| 2000 | | |
| 2001 | CONFIDENTIAL | |
| 2002 | | |
| 2003 | | |

\$ Change '98 to '03 **CONFIDENTIAL**

% Change '98 to '03

Table A demonstrates that between January 1998 and January 2003, WorldCom's per minute ICP rates to the Philippines decreased by **CONFIDENTIAL** cents, or **CONFIDENTIAL** percent, while its total average per minute rates to the Philippines decreased by **CONFIDENTIAL** cents, or **CONFIDENTIAL** percent.

The following table shows there has been a significant shift in WorldCom's mix of ICP and Basic rate minutes over the 1998-2003 period for calls to the Philippines:

| Table B -- | April 97 | Jan 03 |
|-------------------------|---------------------|--------|
| | ----- | ----- |
| % Minutes at ICP rates | CONFIDENTIAL | |
| % Minutes at Basic Rate | | |

In sum, WorldCom's consumer rates for calls to the Philippines have decreased dramatically over the past five years.

One electronic copy of the version of this letter marked "Public File Copy" is being filed with the Secretary of the Federal Communications Commission in accordance with Section 1.1206 of the Commission's rules. Should you have any questions, please do not hesitate to contact the undersigned.

Sincerely,



Scott A. Shefferman

cc: Lisa Choi
Mark Uretsky

Don Ableson
Jackie Ruff
Samuel Feder
Jennifer Manner
Paul Margie
Barry Ohlson
Bryan Tramont
James Talbot, AT&T
Thomas Leuba, Sullivan & Cromwell
Henry Goldberg, Goldberg, Godles, Wiener & Wright
Patricia Paoletta, Wiley Rein & Fielding