

**Before the
Federal Communications Commission
Washington, D.C. 20554**

In the Matter of)
)
Schools and Libraries)
Universal Service) **CC Docket No. 02-6**
Support Mechanisms)
)

WORLDCOM, INC. d/b/a MCI

PETITION FOR RECONSIDERATION/CLARIFICATION

**Larry Fenster
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July 21, 2003

**Before the
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WORLDCOM, INC. d/b/a MCI

PETITION FOR RECONSIDERATION AND/OR CLARIFICATION

I. Summary

WorldCom, Inc., d/b/a MCI, respectfully requests the Commission to reconsider the manner in which schools or libraries may memorialize the choice of discount method they desire to operate under in a given funding year. MCI respectfully requests the Commission to modify the Form 471 or Form 486 to include a “box” which would allow schools or libraries to indicate their desired discount method. The Schools and Libraries Division (SLD) should also be required to include the information contained in this discount method selection box in the electronic information it sends to service providers. This would give service providers sufficient notice to make the necessary arrangements to implement an applicant’s desired discount method before providing service.

II. Argument

New Section 54.514(a) of the Commission’s rules requires service providers to permit the billed entity to choose the method of payment for discounted services prior to the billed entity’s submission of its Form 471.¹ Schools and Libraries typically submit Form 471 between November and January prior to the next funding year, which begins the following July.

However, the new rules do not actually require the billed entity to notify its service provider of its desired discount method. Nor do the rules specify the method by which the billed entity should notify the service provider of its desired discount method.

This could result in very confusing outcomes. One could imagine a service provider filing its Form 471 November 15, calling up and leaving a message to someone at its service provider's business the next day. At this point the service provider would not know whether the billed entity had already filed its Form 471. Then later it would see that the billed entity had provided notice too late. Would the service provider be entitled to choose the discount method in this situation? One could also imagine that a phone message would have been left prior to filing the Form 471, but did not reach the correct person, and the message was erased. Again the service provider person responsible for managing the company's E-rate program might be justified in choosing the discount method in this situation.

MCI believes all parties would benefit if the Commission established a definitive, and indisputable, method by which billed entities provide notice of their desired discount method. The Commission may accomplish this by adding a discount method selection box to its Form 471. Billed entities would be required to complete this box in order for their applications to be considered complete. After the Form 471 is submitted to SLD, SLD should then be required to enter this field into the electronic notification file it sends to service providers. This will permit MCI and other service providers to match this electronic information against customer account databases, which would allow them to automatically flag each customer account with the desired discount method. This would allow service providers to receive a definitive notification of a

billed entity's desired discount and efficiently handle the account changes needed to implement the customer's desires.

MCI also requests the Commission to allow schools and libraries to select their desired discount method on the Form 486. This option used to be on the Form 486 during Year2, but has since disappeared. Schools and Libraries submit their Form 486 after they receive their funding commitment decision letters and once they begin receiving service. Some schools have explained to MCI that they would prefer to indicate to receive a discount on bills only during the actual funding year begins, and not prior to it, as would occur if notification were made on the Form 471, because their next year budgets might be reduced by the amount of the discount if they chose discount-on-bills prior to the beginning of the funding year. If the Commission allows schools to indicate their desired discount as late as the date they file their Form 486, the Commission should also require SLD to enter this field into the electronic notification file it sends to service providers, for the reasons discussed immediately above.

III. Conclusion

For the reasons stated herein, WorldCom urges the Commission to adopt the positions advocated in this Petition for Reconsideration/Clarification.

Sincerely,

Larry Fenster

Larry Fenster

Statement of Verification

I have read the foregoing and, to the best of my knowledge, information and belief, there is good ground to support it, and it is not interposed for delay. I verify under penalty of perjury that the foregoing is true and correct.

Executed on July 21, 2003

Larry Fenster

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CERTIFICATE OF SERVICE

I, Elizabeth Bryant hereby certify that on this 21st day of July, 2003, copies of the foregoing were served by regular mail or E-mail on the following:

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