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October 27, 2003

BY ELECTRONIC DELIVERY

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

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

Dear Ms. Dortch:

Pursuant to section 1.1206(b)(2) of the Commission's rules, attached for inclusion in the record of the three above-referenced proceedings is a letter from Kimberly Scardino, on behalf of WorldCom, Inc., d/b/a MCI, to William F. Maher of the FCC.

Sincerely,

/s/ Ruth Milkman

Ruth Milkman

Attachment

Kimberly A. Scardino
Director
Federal Advocacy

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October 27, 2003

By Electronic Delivery

William F. Maher, Chief
Wireline Competition Bureau
Federal Communications Commission
445 Twelfth Street, S.W.
Washington, D.C. 20554

Re: *Support of ALTS Motion for Extension of Time to File Oppositions to
Petitions for Reconsideration of the Triennial Review Order*

Dear Mr. Maher:

On October 22, 2003, the Association for Local Telecommunications Services ("ALTS") requested a 30-day extension of the deadline for filing comments in the above-referenced proceeding, as well as a corresponding 30-day extension of the deadline to file reply comments.¹ MCI supports this motion.

MCI concurs with ALTS that the requested extension is necessary to allow parties the opportunity to evaluate and respond thoughtfully to the numerous petitions for reconsideration of the *Triennial Review Order*² published in the Federal Register on October 22, 2003. BellSouth in particular has proposed major rule changes with respect to hybrid fiber-copper facilities. BellSouth's proposals raise complex technical and factual questions, and the Commission should not rule on this petition without the benefit of a thorough record. Unless the Commission grants an extension, however, parties will have only fifteen days in which to file oppositions, and ten days thereafter to file replies. These periods of time are unusually short for issues as complex as

¹ ALTS, "Motion for Extension of Comment Period Regarding Petitions for Reconsideration," CC Docket Nos. 01.338, 96-98, 98-147 (Oct. 22, 2003).

² *Review of the Section 251 Unbundling Obligations of Incumbent Local Exchange Carriers*, Report and Order on Remand and Further Notice of Proposed Rulemaking, CC Docket Nos. 01-338, 96-98, 98-147, FCC 03-36 (rel. Aug. 21, 2003) ("*Triennial Review Order*").

those raised in the BellSouth petition, and are too brief to allow parties to develop an adequate factual record. MCI therefore urges the Commission to grant the ALTS motion.

Sincerely,

/s/ Kimberly Scardino

Kimberly Scardino

cc: Scott Bergmann
Matthew Brill
Michelle Carey
Jeffrey Carlisle
Daniel Gonzalez
Christopher Libertelli
Carol Matthey
Jeremy Miller
Thomas Navin
Brent Olson
Jessica Rosenworcel
Julie Veach
Lisa Zaina