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December 24, 2003

Via Electronic Filing

Marlene Dortch, Secretary
Federal Communications Commission
445 12th Street SW
Washington, DC 20554

Re: Developing a Unified Inter-carrier Compensation Regime
CC Docket No. 01-92
Oral Ex Parte Notice

Dear Ms. Dortch:

On December 23, 2003, Hank Hultquist and Alan Buzacott of MCI and A. Richard Metzger, Jr. of Lawler, Metzger, and Milkman, LLC, counsel to MCI, met with the following members of the Pricing Policy Division: Tamara Preiss, Jay Atkinson, Steven Morris, Chris Barnekov, Victoria Schlesinger, Alvaro Gonzalez, and David Hu. This meeting was held for the purpose of responding to staff questions concerning MCI's network and the manner in which it interconnects with other carriers.

Among other things, MCI outlined typical physical interconnection arrangements between MCI as an interexchange carrier and incumbent local exchange carriers (LECs) as well as between MCI as a competitive LEC and incumbent LECs. MCI also discussed interconnection and meet point billing arrangements that are typically involved in exchanging traffic with smaller incumbent carriers. MCI stressed that the physical point of interconnection and the financial point of interconnection between two carriers is frequently not the same point in either carrier's network. MCI also discussed the typical physical interconnection arrangements with Commercial Mobile Radio Service (CMRS) providers and noted that, as with other interconnection arrangements, the cost of the interconnection facility is shared by both carriers. MCI also explained the manner in which Calling Party Number (CPN) is passed along as part of SS7 signaling, how that information can be used by a receiving carrier, and the circumstances in which carriers

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use a percentage of interstate use to identify the jurisdiction of traffic. Finally, MCI compared the differences between traditional FX service and so-called "virtual NXX" service, noting that the former was the product of a monopoly environment whereas the latter emerged in the context of an interconnected environment. MCI's comments were otherwise consistent with its prior submissions in this docket.

Pursuant to section 1.1206(b)(2) of the Commission's rules, 47 C.F.R. § 1.1206(b)(2), this letter is being provided to you for inclusion in the public record of the above-referenced proceeding.

Sincerely,

/s/ A. Richard Metzger, Jr
A. Richard Metzger, Jr.

cc: Jay Atkinson
Chris Barnekov
Alvaro Gonzalez
David Hu
Steven Morris
Tamara Preiss
Victoria Schlesinger