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February 17, 1998

**BY HAND DELIVERY**

Ms. Blanca Bayo, Director  
Division of Records and Reporting  
Room 110, Easley Building  
Florida Public Service Commission  
2540 Shumard Oak Blvd.  
Tallahassee, Florida 32399-0850

Re: Docket Nos. 960757-TP, 960833-TP and 960846-TP

Dear Ms. Bayo:

Enclosed for filing on behalf of WorldCom, Inc. are an original and fifteen copies of WorldCom's Response to BellSouth's Notice and Request for Approval of Order Interpretation in the above-referenced dockets.

Please acknowledge receipt of these documents by stamping the extra copy of this letter "filed" and returning the same to me.

- ACK \_\_\_\_\_
- AFA \_\_\_\_\_
- APP \_\_\_\_\_
- CAF \_\_\_\_\_
- CMU \_\_\_\_\_
- CTR \_\_\_\_\_
- EAG \_\_\_\_\_
- LEG 2 \_\_\_\_\_
- LIN 5 Enclosures
- OPC \_\_\_\_\_
- RCH \_\_\_\_\_
- SEC 1 \_\_\_\_\_
- WAS \_\_\_\_\_
- OTH \_\_\_\_\_

Thank you for your assistance with this filing.

Sincerely,

*Norman Alford*  
Floyd R. Self

cc: Mr. Brian Sulmonetti

RECEIVED & FILED

*[Signature]*  
FPSC-BUREAU OF RECORDS

DOCUMENT NUMBER-DATE

02299 FEB 17 98

FPSC-RECORDS/REPORTING

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition by Metropolitan Fiber Systems of Florida, Inc. for arbitration with BellSouth Telecommunications, Inc. concerning interconnection rates, terms and conditions, pursuant to the Federal Telecommunications Act of 1996

Docket No. 960757-TP

In re: Petition by AT&T Communications of the Southern States, Inc. for arbitration of certain terms and conditions of a proposed agreement with BellSouth Telecommunications, Inc. concerning interconnection and resale under the Telecommunications Act of 1996.

Docket No. 960833-TP

In re: Petition by MCI Telecommunications Corporation and MCI Metro Access Transmission Services, Inc. for arbitration of certain terms and conditions of a proposed agreement with BellSouth Telecommunications, Inc. concerning interconnection and resale under the Telecommunications Act of 1996.

Docket No. 960846-TP  
Filed: February 17, 1998

RESPONSE OF WORLDCOM, INC TO BELLSOUTH'S NOTICE AND REQUEST FOR APPROVAL OF ORDER INTERPRETATION

WorldCom, Inc., for itself and its subsidiary Metropolitan Fiber Systems of Florida, Inc., ("WorldCom"), pursuant to Rule 25-22.037, Florida Administrative Code, hereby responds to the Notice and Request for Approval of BellSouth Telecommunications, Inc.'s Interpretation of Order No. PSC-96-1579-FOF-TL ("Request"), and urges the Commission to deny any attempt to apply the Request to WorldCom.

1. On February 9, 1998 BellSouth filed its Request with this Commission proposing to outline its interpretation of Order No. PSC-96-1579-FOF-TL with respect to the implementation of

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the Order's provisions for the three month timeframe for physical collocation. While WorldCom believes that BellSouth does not intend for its Request to apply to WorldCom, in an abundance of caution, WorldCom wishes to make explicit that any such application of the "interpretation" to WorldCom through this Request would be inappropriate.

2. First, Order No. PSC-96-1579-FOF-TP resolves BellSouth's arbitration with AT&T and MCI. WorldCom's arbitration with BellSouth was resolved in a different docket by a different order that does not contain the three month language at issue in Order No. PSC-96-1579-FOF-TP. Accordingly, there can be no "interpretation" of Order No. PSC-96-1579-FOF-TP made applicable to WorldCom since this Order does not apply to WorldCom in the first place.

3. Second, on the basis of its separate negotiations and arbitration with BellSouth, WorldCom and BellSouth have entered into a interconnection agreement that has its own provisions regarding physical collocation. Thus, to the extent BellSouth has any problems with respect to the implementation of its agreement with WorldCom, BellSouth is obligated to first contact WorldCom and attempt to resolve such issues directly with WorldCom. See Section 33, Florida Partial Interconnection Agreement (approved by Order No. PSC-96-1506-FOF-TP, issued December 12, 1996). Since BellSouth has not approached WorldCom with respect to the "interpretation" at issue in its Request, it would be a violation of the WorldCom-BellSouth interconnection agreement to unilaterally apply BellSouth's Request to WorldCom.


4. Because WorldCom believes that BellSouth's Request does not apply to WorldCom, WorldCom has not attempted to address the merits of BellSouth's proposal. However, if BellSouth is proposing to apply this Request to WorldCom, WorldCom reserves the right to then address the merits of BellSouth's Request.

WHEREFORE, in order to ensure that WorldCom's rights are properly protected, WorldCom requests that the Commission find that BellSouth's Request does not apply to WorldCom.

Dated this 17th day of February, 1998.

Respectfully submitted,

MESSER, CAPARELLO & SELF, P.A.  
Post Office Box 1876  
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(850)222-0720



FLOYD R. SELF, ESQ.  
NORMAN H. HORTON, JR., ESQ.

Attorneys for WorldCom, Inc.

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that true and correct copies of WorldCom's Response to BellSouth's Notice and Request for Approval of Order Interpretation in Docket Nos. 960757-TP, 960833-TP, and 960846-TP have been served upon the following parties by Hand Delivery (\*) and/or U. S. Mail this 17th day of February, 1998.

Charles Pellegrini, Esq.\*  
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c/o Ms. Nancy Sims  
BellSouth Telecommunications, Inc.  
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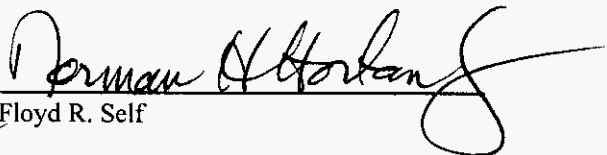
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