

MCImetro Access Transmission Services, LLC's, and MCI WorldCom Communications, Inc.'s Responses to 2000 ALEC Data Request

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Florida Statute 364.02(2) defines basic local service as:

"Basic local telecommunications service" means voice-grade, flat-rate residential and flat-rate single line business local exchange services which provide dial tone, local usage necessary to place unlimited calls within a local exchange area, dual tone multi-frequency dialing, and access to the following: emergency services such as "911," all locally available interexchange companies, directory assistance, operator services, relay services, and an alphabetical directory listing. For a local exchange company, such term shall include any extended area service routes, and extended calling service in existence or ordered by the commission on or before July 1, 1995.

- 1. a. Are you providing service to residential customers in Florida that complies with the above definition of basic local service?

RESPONSE: No. Neither MCImetro or MCI WorldCom Communications, Inc. is providing basic local service to residential customers in Florida.

- b. To how many residential customers are you providing basic local service in Florida?

RESPONSE: N/A

- c. What are your current rates for providing residential basic local service?

RESPONSE: N/A

- d. Are you providing service to business customers in Florida that complies with the above definition of basic local service?

RESPONSE: Yes.

- e. To how many business customers are you providing basic local service in Florida?

RESPONSE: MCImetro: [REDACTED] MCI WorldCom Communications: [REDACTED]

NOTE: These numbers reflect a combination of services provided with basic local service rather than stand-alone basic local service.

- APP \_\_\_\_\_
CAF \_\_\_\_\_
CMP \_\_\_\_\_
COM \_\_\_\_\_
CTR \_\_\_\_\_
ECR \_\_\_\_\_
LEG \_\_\_\_\_
OPC \_\_\_\_\_
PAI \_\_\_\_\_
RGO \_\_\_\_\_
SEC \_\_\_\_\_
SER \_\_\_\_\_
OTH \_\_\_\_\_

- f. What are your current rates for providing business **basic local service** in Florida?

RESPONSE:

Miami/Ft. Lauderdale: \$29.10 per Line  
Orlando: \$28.60 per Line  
Tampa: \$29.90 per Line  
Winter Park: \$24.03 per Line  
Boca Raton: \$28.00 per Line

The above rates are monthly recurring charges applicable to both MCImetro and MCI WorldCom Communications, Inc. basic local service.

2. Are you currently providing other forms of local service (business or residential) in Florida that may not meet Florida's statutory definition of **basic local service**? (Examples could include: multi-line business users; services with toll or usage restrictions; mandatory 900 blocking; limited amount of local calling included in the monthly charge; bundled service offering; etc.)

(If yes, continue with question #2; if no, skip to Question #3)

RESPONSE:

Yes, for both MCImetro and MCI WorldCom Communications, Inc. customers may choose from the following additional services:

Local trunk-basic, local trunk-DID and 2-way DID, ISDN PRI. MCIIm and MCIW also provide several optional features for local lines and a few for local trunk.

Local line customers and local trunk-basic customers can choose a flat rate, per minute or per call plan. Local trunk-DID and 2 way direct are currently flat rate services in Florida.

- a. Are you currently providing other forms of local service to residential customers in Florida?

RESPONSE: No.

- b. If the response to a. is affirmative, please describe the forms of local service you are providing to residential customers in Florida. (If available, please provide brochures or comparable materials.)

RESPONSE: N/A

- c. If the response to a. is affirmative, please indicate your current rates for the services indicated in response to b.

RESPONSE: N/A

- d. Are you currently providing other forms of local service to business customers in Florida?

RESPONSE: Yes.

- e. If the response to d. is affirmative, please describe the forms of local service you are providing to business customers in Florida. (If available, please provide brochures or comparable materials.)

RESPONSE:

**LOCAL TRUNK BASIC** - provides voice grade communication channel(s) to the customer's private branch exchange (PBX) or hybrid key system. Local trunks can be provisioned as either analog or digital and can be used to carry one-way outbound, one-way inbound, or two-way traffic.

**LOCAL TRUNK** - direct inward dialing (DID) provides a single analog or digital connection which can carry one-way, inbound traffic.

**LOCAL TRUNK** - 2 way direct provides two-way direct dial digital and analog connection which can carry both inbound and outbound traffic. It has the ability to route a block of numbers to a trunk group, receive outpulsed digits on calls incoming through that trunk group and make outgoing calls using the same trunks.

**LOCAL ISDN** - Primary rate interface (ISDN-PRI) is an alternative arrangement for individual local exchange services such as local trunk basis and local trunk DID. It is provisioned at the 1.544 MBPS rate via primary rate interfaces standard of the integrated services digital network (ISDN). Local ISDN-PRI provides the customer with the capabilities of simultaneous access, transmission and switching of voice, data and imaging services via channelized transport.

In addition, MCI<sub>m</sub> and MCI<sub>w</sub> also provide several optional features for local lines and a few for local trunk. Local line and local trunk - basic customers have the option of choosing a flat rate, per minute rate, or per call rate plan. Local trunk DID and 2 way direct are currently flat rate services.

- f. If the response to d. is affirmative, please indicate your current standard rates for the services indicated in response to e.

RESPONSE:

Local Line

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Miami/Ft. Lauderdale:	\$12.69 per line
Orlando:	\$12.31 per line
Tampa:	\$17.67 per line
Winter Park:	\$12.31 per line
Boca Raton:	\$11.86 per line

Local Trunk-Basic

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Miami/Ft. Lauderdale:		
Per Minute/Per Call	\$11.12 per trunk	
Flat Rate	\$49.47 per trunk	
Orlando:		
Per Minute/Per Call	\$10.93 per trunk	
Flat Rate	\$48.62 per trunk	
Tampa		
Per Minute/Per Call	\$29.00 per trunk	
Flat Rate	\$52.05 per trunk	
Winter Park		
Per Minute/Per Call	\$10.93 per trunk	
Flat Rate	\$48.00 per trunk	
Boca Raton		
Per Minute/Per Call	\$10.71 per trunk	
Flat Rate	\$47.60 per trunk	

Local Trunk-DID/2-way Direct

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Miami/Ft. Lauderdale:	\$71.27 per trunk
Orlando:	\$70.42 per trunk
Tampa:	\$52.05 per trunk
Winter Park	\$78.00 per trunk
Boca Raton:	\$69.40 per trunk

In addition blocks of DID number apply in each marker refer to tariff for monthly charge.

PRI

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Miami/Orlando/Ft. Lauderdale/Boca Raton: \$1,450.00

Tampa: Flat Rate Option: \$875.00  
Per Minute/Per Call Option: \$775.00

Winter Park: \$825.00

3. Please describe the method(s) you are using to provide telephone services (e.g., resale, interconnection, unbundled network elements, facility-based, etc.).

RESPONSE:

MCI WorldCom Communications, Inc. provides telephone services via resale, interconnection, unbundled network elements, and its own facilities.

MCImetro currently provides telecommunications services via interconnection, unbundled network elements, and its own facilities.

- a. Please indicate, by exchange, the number of LEC access lines you are reselling to residential customers.

RESPONSE: None

- b. Please indicate, by exchange, the number of LEC access lines you are reselling to business customers.

RESPONSE: None

- c. Please indicate, by exchange, the types of unbundled network elements, if any, you are obtaining from the incumbent LEC.

RESPONSE: The Company is still obtaining the information requested and will provide the staff with the response as soon as it is available.

- d. Please indicate, by exchange, the number of unbundled local loops, if any, you are obtaining from the incumbent LEC.

MCImetro: MCI is still obtaining the information requested and will provide the staff with the response as soon as it is available.

MCI WorldCom Communications, Inc. [REDACTED]

- e. Please indicate the types of facilities deployed by your company in Florida to provide local telephone services, and indicate where these facilities are deployed.

RESPONSE:

Local Switches:

MCI WorldCom has local switches in Miami, Orlando, Tampa and Pompano Beach.

- f. If known, please indicate the number of access lines, separately for residential and business customers, provisioned solely over company-owned facilities.

RESPONSE:

MCI WorldCom Communications, Inc.: [REDACTED]

MCImetro: [REDACTED]

- g. Please indicate, by exchange, the number of business access lines you serve that are provided to internet service providers.

RESPONSE: Neither MCImetro or MCI WorldCom Communications, Inc. keeps records in the normal course of business of the number of business access lines that are provided to specific types of local customers, such as internet service providers or voicemail service providers.

- h. Please indicate, by exchange, the number of business access lines you serve that are provided to voicemail service providers.

RESPONSE: Neither MCImetro or MCI WorldCom Communications, Inc. keeps records in the normal course of business of the number of business access lines that are provided to specific types of local customers, such as internet service providers or voicemail service providers.

- 4. Please indicate the number and location of switches you have located in Florida, if any, used to provide service to customers in Florida.

RESPONSE: Please refer to the response for Item 3(e).

5. For each exchange where you are providing any form of residential local telephone service, please identify by exchange (a list of exchanges is attached), the number of residential access lines served. (See example below)

RESPONSE: N/A

6. For each exchange where you are providing any form of business local telephone service, please identify by exchange (a list of exchanges is attached), the number of business access lines served as of June 30, 2000. (See example below)

Examples

Miami Exchange: Residential Access Lines - 154 Business Access Lines - 255  
Yulee Exchange: Residential Access Lines - 161 Business Access Lines - 202

RESPONSE:

MCImetro internally tracks the number of accounts. The term "customers," as described below, refers to the number of accounts. Some customers, of course, may have multiple accounts, and may have several lines and/or trunks.

Ratecenter	# of Customers	# of Lines	# of Trunks	Service Delivery Method
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]

MCI WorldCom Communications, Inc.:



7. For billing and accounting purposes, do you differentiate between residential and business customers?

RESPONSE: N/A

a. Are you currently offering any enhanced service? If yes, what are they?

RESPONSE: Yes, currently MCIMetro and MCI WorldCom Communications, Inc. offer voicemail.

b. Have you experienced any significant barriers in entering Florida's local exchange markets? Please list and describe any obstacles or barriers encountered.

RESPONSE: The most significant barriers to entry in Florida's local exchange market are those identified in the FCCA's petition in Docket No. 981834-TP. Those significant barriers include high UNE prices, particularly for switching and non-recurring charges, difficulty obtaining combinations of UNEs, including UNE platform, the need to deaverage loop prices, and the completion of the third-party testing of BellSouth's OSS systems. Moreover, it is imperative that when an ALEC files a complaint against an ILEC involving an interconnection agreement that it be resolved in an expedited manner.

d. Have you experienced any difficulties involving any agreements you may have with incumbent LECs? If so, please describe any significant problems encountered.

RESPONSE:

MCImetro and MCI WorldCom Communications filed a complaint against BellSouth. (Docket No. 991755-TP) MCIm's and MCIW's local switches terminate calls throughout geographic areas that are comparable in size to the areas served by BellSouth's tandem. MCIm and MCIW have therefore been entitled since the Supreme Court's January 25, 1999 decision to be compensated for terminating local calls from BellSouth customers to MCIm or MWC at a rate equal to the sum of the tandem interconnection rate and the end office interconnection rate. The Commission should require BellSouth to amend its interconnection agreements with MCIm and MCIW to reflect this compensation provision and should require BellSouth to credit MCIm and MWC for its underpayments to them since January 25, 1999.

MCImetro and MCI WorldCom Communications had filed complaints against BellSouth to enforce reciprocal compensation provisions regarding the



termination of local traffic, including traffic that terminates to their ISP customers. The FPSC held that BellSouth is required to compensate these ALECs for all local traffic, including terminating local calls to their ISP customers. BellSouth has appealed the Commission's decision; however, the decision was not stayed. MCImetro and MCI WorldCom Communications had experienced difficulty collecting the money owed to them. BellSouth has now compensated them as required by Order.

- e. Do you anticipate that your long-term manner of providing service will differ from your current practice? If so, do you expect becoming a full-scale facilities-based provider?

RESPONSE: Once the FPSC has completed the items identified in response to Item No. 14, the company expects to be able to provide additional facilities-based services to its customers.

- f. Have you been assigned your own NXX codes? If yes, how many codes have you been assigned and for each code, as of January 31, 2000, how many numbers have been assigned from the code?

RESPONSE:

MCI WorldCom Communications, Inc.

ASSIGNED CODES

NPA	NXX	# OF TN ASSIGNED
[REDACTED]	[REDACTED]	[REDACTED]

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MCIMetro

ASSIGNED CODES

NPA

NXX

# OF TN ASSIGNED

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8. If you are not currently providing local telephone service in Florida:

RESPONSE: N/A

- a. Please explain why you are not providing local telephone service. For example, have you experienced marketing or billing difficulties? Lack of capital? Customers are not willing to try something new? Lack of expertise in telecommunications? Difficulties dealing with the LECs? Insufficient profit margin?
  - b. Do you anticipate providing local telephone service at some future date? If yes, please indicate when. (e.g., first quarter 2000)
  - c. Please describe the most important factors that you believe are inhibiting your ability to provide local telephone service, and describe how these factors have adversely affected your entry.
  - d. Are you currently providing any other telecommunications services in Florida (i.e., other than local service)? If yes, please list the services provided.
9. Please list your primary line of business (for example, entertainment, cable television, private line/special access service, interexchange service, local service, cellular service, paging service, electric service, municipality, etc.).

RESPONSE: MCImetro and MCI WorldCom Communications, Inc. are subsidiaries of WorldCom, Inc. WorldCom, Inc., through its many subsidiaries, is one of the largest telecommunications companies in the United States, serving local, long distance, and

Internet customers domestically and internationally. The products and services provided by the Company include switched and dedicated long distance and local products, dedicated and dial-up Internet access, wireless services, 800 services, calling cards, private lines, broadband data services, debit cards, conference calling, messaging and mobility services, advanced billing systems, enhanced fax and data connections, high speed data communications, facilities management, local access to long distance companies, local access ATM-based backbone service, Web server hosting and integration services, dial-up networking services and interconnection to ISPs.

10. At any time during the last 12 months have you provided local telephone services in Florida and then withdrawn the service? If yes, please discuss the reasons for this decision.

RESPONSE: No

11. If you or an affiliate provides cable television in Florida, do you offer any package plans combining cable television and local telephone services? If so, please indicate where such packages are being offered.

RESPONSE: N/A

12. If you or an affiliate provides long distance telephone service in Florida, do you offer any package plans combining long distance and local telephone services? If so, please describe any such plans and their terms and conditions. Is subscribing to both local telephone and long distance a condition or providing service?

RESPONSE: Yes, WorldCom, Inc. offers MCI WorldCom on-net services. This service offers both local and long distance telecommunications services. The customer signs an "on-net" agreement form on which he indicates whether his service is long distance only, local only, or local and long distance combines. Customers are entitled to discounts associated with a term agreement. Under this plan, when a customer has combined usage of both local and long distance, these discounts are deeper.

13. If you or an affiliate's primary business is unrelated to the provision of telecommunications, please indicate the nature of such primary business(es). Examples of such businesses could include, but are not limited to: pawn shops, title loan companies, alternative automobile financing, internet service providers, or check cashing services.

RESPONSE: Please see response to Item 9.

14. Please describe any actions available to the Florida Public Service Commission which you believe should be taken to foster local exchange competitive market entry.

RESPONSE:

- 1) It is critical for local market entry that the FPSC establish truly forward-looking economic UNE costs, including nonrecurring charges, combinations of UNEs, and deaveraging loops. The FPSC is currently reviewing such costs in Docket No. 990649-TP. Widespread local competition will not begin in Florida until the pricing of UNEs is truly based on forward-looking economic costs.
- 2) MCI WorldCom commends the FPSC's actions in conducting the third-party testing of BellSouth's OSS systems thus far. The FPSC needs to ensure the project is completed as scheduled in the first quarter of 2001, because any delay in test completion contributes to delays in meaningful local entry by ALECs.
- 3) Although the FPSC has considered issues related to collocation, the FPSC also needs to establish on a generic basis collocation rates, and related terms and conditions.
- 4) The FPSC has established Docket No.000121-TP regarding performance measurements. As part of this docket, it is essential for the FPSC to establish self-executing remedies to ensure compliance by the ILECs, because such compliance is essential for meaningful local entry by ALECs.
- 5) The FPSC should develop expedited complaint procedures when an ALEC files a complaint against an ILEC regarding its interconnection agreement.
- 6) Finally, the FPSC should ensure that the ILEC treats its own affiliated operations (i.e., ALEC, IXC or ISP) in the same manner as other competitors and does not provide special treatment to its affiliated operations (ALEC, IXC or ISP).

15. Please describe any actions which you may believe should be taken by the Florida legislature that would foster local exchange competitive market entry.

RESPONSE: The Florida Legislature has been working on fostering competition since 1995, initially by authorizing competition in the local exchange market and eliminating rate of return regulation for the ILECs. MCI WorldCom advocates that the Legislature should:

- 1) develop expedited complaint procedures involving interconnection agreements for the FPSC;
- 2) support policies that prevent anti-competitive behavior and discriminatory pricing;
- 3) maintain current universal service policy; and

- 4) support nondiscriminatory access to buildings; and
- 5) provide tax incentives to place Internet-related equipment in Florida.

16. Please provide any additional comments or information you believe will assist staff in evaluating and reporting on the development of local exchange competition in Florida. In particular, we are seeking comment on obstacles that you believe may be impeding the growth of local competition in the state and any suggestions you may have on how to remove such obstacles.

RESPONSE: The Florida Public Service Commission and the Florida Legislature should act quickly to remove the barriers to local entry identified in previous responses. Once those barriers have been removed, the state of Florida should begin to see significant local entry. In particular, the price for UNEs needs to be set at a forward-looking cost-based rate that will allow widespread residential local entry.