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December 19, 1997

Ms. Blanca S. Bayó
Director, Records & Reporting
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850

Re: Docket No. 960833-TP, 960846-TP, 960747-TP & 971140-TP

Dear Ms. Bayó:

Enclosed for filing on behalf of MCI Telecommunications Corporation and MCImetro Access Transmission Services, Inc., in the above dockets, are the original and 15 copies of MCI's Supplement to MCI's Motion to Compel Compliance.

By copy of this letter, this document has been provided to the parties on the attached service list.

Very truly yours,



Richard D. Melson

RDM/clp
Enclosures
cc: Parties of Record

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition by MCI)
Telecommunications Corporation) Docket No. 960846-TP
and MCI Metro Access Transmission)
Services, Inc. for arbitration of)
certain terms and conditions of a) Filed: December 19, 1997
proposed agreement with BellSouth)
Telecommunications, Inc.)
concerning interconnection and)
resale under the)
Telecommunications Act of 1996.)

SUPPLEMENT TO MCI'S MOTION TO COMPEL COMPLIANCE

MCI Telecommunications Corporation and MCI Metro Access Transmission Services, Inc. (MCI) hereby file this supplement to the Motion to Compel Compliance (Motion) previously filed in this docket on October 27, 1997.

1. In its earlier Motion, MCI asked the Commission to compel BellSouth to comply with the provisions of its Interconnection Agreement with MCI relating to the provision of combinations of UNEs.

2. During the issue identification process for the February 24, 1998 hearing it became clear that:

(a) MCI contends that the Interconnection Agreement requires BellSouth to provide combinations of UNEs at the sum of the prices for the individual UNEs contained in the combination.

(b) BellSouth contends that (at least in certain situations where an existing BellSouth service is allegedly recreated) the

Interconnection Agreement is silent on the methodology for determining the price of combinations of UNEs.

3. In the event the Commission ultimately determines that the Interconnection Agreement is silent on the pricing combinations of UNEs under any particular circumstances, it is clear from the parties' prior negotiations that they will be unable to reach agreement on the appropriate methodology for determining the price of such combinations.

4. Under Section 23 of Part A of the Interconnection Agreement:

...the parties agree that any dispute arising out of or relating to this Agreement that the parties themselves cannot resolve, may be submitted to the Commission for resolution.


5. If, as a result of its ruling on the contract interpretation issues raised by the Motion, the Commission determines that the Interconnection Agreement is silent as to the methodology to be used for determining the price of any combinations of UNEs, MCI hereby requests that the Commission resolve the dispute relating to the method by which such prices are to be set. By making this request, MCI does not waive its position that this pricing question is already covered by the terms of the Interconnection Agreement.

WHEREFORE, MCI hereby supplements its Motion to Compel Compliance and requests that the Commission resolve, as part of the upcoming proceedings on such Motion, any contingent issue that arises as to the methodology for determining prices of

combinations of UNEs which the Commission determines are not covered by the Interconnection Agreement.

RESPECTFULLY SUBMITTED this 19th day of December, 1997.

HOPPING GREEN SAMS & SMITH, P.A.

By: 
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and

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a copy of the foregoing was furnished to the following parties by U.S. Mail or hand delivery(**) this 19th day of December, 1997.

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