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August 13, 1996

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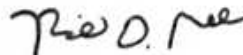
Re: Docket No. 960290-TP

Dear Ms. Bayó:

On behalf of MCI Telecommunications Corporation and MCImetro Access; Transmission Services I have enclosed for filing in the above docket the original and 15 copies of MCI's Protest of Order NO. PSC-96-0959-FOF-TP.

By copy of this letter these documents have been provided to the parties on the attached service list.

Very truly yours,



Richard D. Melson

RDM/cc
Enclosures
cc: Parties of Record

RECEIVED & FILED

FPSC BUREAU OF RECORDS

DOCUMENT NUMBER-DATE

08467 AUG 13 96

FPSC-RECORDS/REPORTING

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition by AT&T)
Communications of the Southern) Docket No. 960290-TP
States, Inc. to require carriers)
to file interconnection) Filed: August 13, 1996
agreements, in compliance with)
Section 252(a) of the)
Telecommunications Act of 1996.)

MCI'S PROTEST OF ORDER NO. PSC-96-0959-FOF-TP

MCI Telecommunications Corporation and MCImetro Access Transmission Services, Inc. (collectively, MCI) hereby protest Order No. PSC-96-0959-FOF-TP (PSC Order). As grounds therefor, MCI states:

1. The PSC Order limits the interconnection agreements that are to be filed with the Commission pursuant to Section 252(a)(1) of the Telecommunications Act of 1996 to agreements between local exchange telecommunications carriers operating in the same geographic market.

2. In adopting this limitation, the Commission rejected the position of AT&T and MCI that the Act requires the filing of all interconnection agreements, including those among incumbent LECs who do not operate in the same geographic market, and between incumbent LECs and other telecommunications companies with whom the incumbent LEC may not directly compete.

3. On August 8, 1996, the FCC issued its First Report and Order regarding Implementation of the Local Competition Provisions in the Telecommunications Act of 1996, CC Docket No. 95-98 (FCC Order).

4. The FCC Order concludes that Section 252(a)(1) requires all preexisting interconnection agreements, including agreements between neighboring LECs, to be submitted to the appropriate state commission for review and approval. (FCC Order, ¶165-169)

5. The FCC Order requires agreements between Class A carriers (i.e. carriers with annual revenues of \$100 million or more) to be filed with the appropriate state commission no later than June 30, 1997. (FCC Order, ¶171)

6. The FCC Order leaves to the state commissions the option to establish a shorter time period for filing preexisting agreements between Class A carriers, and to establish reasonable time frames for filing of other preexisting agreements. (FCC Order, ¶171)

7. MCI requests that the Commission withdraw its Notice of Proposed Agency Action Order No. PSC-96-0959-FOF-TP, and conduct further proceedings in this docket to establish time frames and procedures that are consistent with the FCC Order for the filing of all interconnection agreements. In particular, MCI requests that the Commission consider establishing an earlier deadline for filings by Class A carriers than the outside date (July 30, 1997) established by the FCC's Order.

8. At this time, MCI is not aware of any factual issues in dispute that would require a formal hearing on this protest under section 120.57(1), Florida Statutes. MCI believes that this matter can probably best be resolved through further PAA proceedings.

9. In the event the Commission elects not to withdraw its order and conduct a further PAA proceeding, MCI hereby requests an informal administrative hearing under section 120.57(2), Florida Statutes, on the timing and procedures for filing and reviewing preexisting interconnection agreements.

10. MCI's substantial interests are affected by this proceeding because, under Section 252(i) of the Act, MCI is entitled to obtain the same terms and conditions for interconnection as are contained in any agreement filed and approved pursuant to the Act.

RESPECTFULLY SUBMITTED this 13th day of August, 1996.

HOPPING GREEN SAMS & SMITH, P.A.

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and

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ATTORNEYS FOR MCI

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a copy of the foregoing was furnished to the following by U.S. Mail this 13th day of August, 1996.

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