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January 23, 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 No. [REDACTED]

Dear Ms. Bayo:

Enclosed for filing are an original and fifteen copies of WorldCom's Comments in the above-referenced docket.

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

Thank you for your assistance with this filing.

Sincerely,

Norman H. Horton, Jr.
Norman H. Horton, Jr.

ACK _____

AEA _____
A.P. *Caldujell*

CAF 2

CMH NHH:amj

CTR Enclosures

cc: Mr. Brian Sulmonetti

Parties of Record

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FPSC-RECORDS/REPORTING

ORIGINAL

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Proposed Rule 25-24.845, F.A.C.,)
Customer Relations; Rules Incorporated,)
and Proposed Amendments to Rule)
25-4.003, F.A.C., Definitions;)
24-4.110, F.A.C., Customer Billing;)
25-4.118, F.A.C., Interexchange Carrier)
Selection; 25-24.490, F.A.C., Customer)
Relations; Rules Incorporated)

Docket No. 970882-T1
Filed: January 23, 1998

COMMENTS OF WORLDCOM, INC.

Pursuant to Section 120.54(3), Florida Statutes and the Notice of Rulemaking published in the Florida Administrative Weekly (January 2, 1998), WorldCom, Inc. herewith submits its comments on the rules proposed by the Florida Public Service Commission in this docket.

1. WorldCom is generally supportive of the efforts of the Commission to curtail the unauthorized change of a consumers' selected local and/or toll service provider. However, simply modifying or adopting additional rules is not the only answer to the issue. While some modifications may be appropriate, there will continue to be a need for enforcement to deter slamming. Providers who do not follow current rules are less likely to follow more stringent rules and those providers who do follow the rules should not be penalized through this process. Consequently, WorldCom would urge the Commission to consider revisions to the proposed rules consistent with the following comment and the comments and proposals filed by the Florida Competitive Carriers Association ("FCCA").

2. WorldCom provides either or both local and toll service in several jurisdictions and thus must comply with a variety of rules and regulations. There is a cost associated with complying with a different set of rules in each state. As a lower cost alternative to the slamming concerns in

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Florida, WorldCom would suggest, as have others, that the Florida Public Service Commission adopt the FCC's rules regarding slamming. Enforcement of the rules would remain with the state but the uniformity between jurisdictions would facilitate interpretation and compliance and would result in lower costs to carriers and consumers. Adoption of the Federal Communications Commission's rules would be efficient and a lower cost method than the method proposed in this proceeding.

2. The FCCA has also addressed the lower cost method of adopting the Federal Communications Commission's rules but has also proposed a second alternative with their comments and prehearing statement. The alternative lower cost method would be to make changes to the proposed rules and WorldCom is in support of these proposals.

3. The proposed modification to Rule 25-4.110(10) would require each bill after January 1, 1998 to include information as to the carrier, the certificate number the type of service provided and a toll free number. Since carriers will require time to implement any of the changes being considered or proposed, there should be sufficient time allowed to implement these changes. An effective date of January 1, 1999, or 6 months after the rule changes become final should be adopted in order to allow for an accurate, orderly integration of the changes. Also, WorldCom would read the rule to only require that the information be provided if the service is billed. For example, a provider of toll service directly billing a customer would not be required to provide information with respect to local or local toll service. WorldCom would propose that this be the interpretation and thus the rule would apply to LECs only. The Commission could clarify this by eliminating the incorporation of subsection (10) in Rule 25-24.490(1) (page 43 of Order). Finally, WorldCom recommends that requirement to include a carriers certificate number be deleted. This provides no

beneficial information to the customer but it would add additional costs to the provider to make the necessary changes to the billing systems.

4. Proposed Rule 25-4.110(12) imposes requirements to notify customers of the availability of PIC freezes. WorldCom does not oppose the requirement to provide such notice but does share the concern that there is a potential for abuse of the freeze notification requirement. When administered by an incumbent LEC both the notification and the process of notification should be carefully reviewed to insure that the notice is accurate and proper. The incumbent LEC is less a neutral participant in any PIC freeze program than in the past thus the Commission should carefully consider the potential anticompetitive results of an ILEC administered program. One restriction to consider would be to require an ILEC to obtain independent third party verification of any PIC freeze provided by themselves or an affiliate and for notification to be accurate.

5. In proposed Rule 25-4.118(2)(b)3 the rule would require a recording of the originating telephone number via ANI for customer initiated calls. There is a question as to whether this is technically possible since not all ANI's may be transmitted. Even if they are, there would be an expense associated with this. On the other hand, independent third party verification would provide the same assurances.

6. The changes to Rule 25-4.118(6) would require the provider to maintain LOAs and audio recordings for a period of 1 year. With all the notice requirements by the rules, a 6 month retention requirement should be more than adequate. Consumers will have notice of any changes and there is not benefit to having records for more than 6 months.

7. More importantly, the proposed rules would require recording of sales and the retention of those. Again, given the extensive verification and record retention requirements this is

unnecessary and merely adds to the record keeping and increases expenses without providing any benefits.

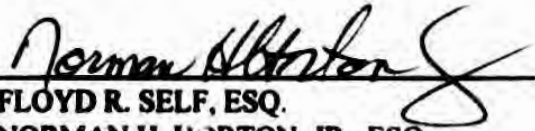
8. Rule 25-4.118(8) is proposed to be modified to require full credit to customers for the first 90 days and credit on a rerated basis between 90 days and 12 months. Again, WorldCom joins with the Commission and other parties in support of efforts which will provide efficient responses to the problem at hand. These changes do not provide an efficient approach but rather encourages abuse and inappropriately penalizes providers. In the first instance if a customer is improperly changed a reasonable credit would be for the first 30 days, not 90 days. Second, the requirements to rerate and credit customers for up to 12 months is simply an invitation to some customers to wait until the last month to raise a complaint and thereby receive free service plus credit as a result of the rerating. Customers will have more than adequate notice that their provider has been changed and more than ample time to object to that change. Certainly customers should not be harmed by an unauthorized change but neither should they be enriched to the detriment of other consumers. As the proposal is written, abuse is invited and WorldCom urges that the credit period be reduced to 30 days and the rerating requirement be deleted.

9. Rule 25-4.118(13) requires that a provider give a customer a copy of the "authorization" relied upon for a switch upon request. This should be expanded or clarified to include verification information since third party verification is an approved verification method.

10. There appears to be an overlap of customer notification requirements in the proposed changes. For example, rule 25-4.110(10) requires information regarding carriers on each bill and subsection (13) requires notice on the first or second page of the next bill when service has been changed. This seems to be duplicative and should be clarified or combined.

11. Finally, WorldCom again expresses support of the comments submitted by the FCCA and urges consideration of the proposals in those comments. Additionally, WorldCom has responded to Staff's Data Requests and incorporates those responses herein.

Respectfully submitted,


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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that true and correct copies of WorldCom's Comments in Docket No. 970882-T1, have been served upon the following parties by Hand Delivery (*) and/or U. S. Mail this 23rd day of January, 1998.

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