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October 2, 1998

RECORDS AND REPORTING  
OCT -2 PM 3:29  
MESSER, CAPARELLO & SELF

**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. 980000B-SP

Dear Ms. Bayo:

Enclosed on behalf of WorldCom Technologies, Inc., a wholly owned subsidiary of MCI WorldCom, Inc., are an original and fifteen copies of comments on the scenarios discussed at the workshop held Sept. 15th. MCI WorldCom also filed comments with the Commission prior to the two workshops responding to questions or expressing a position on issues under study for this report and we are not repeating those here. We would also refer the Staff to the joint comments filed by Teligent with the permission of several other participants. MCI WorldCom generally concurs with these comments and they offer a comprehensive review of the issues. I am also enclosing a 3 1/2" diskette with the document on it in WordPerfect 6.0/6.1 format.


ACK \_\_\_\_\_  
AFA \_\_\_\_\_  
APP \_\_\_\_\_  
CAF \_\_\_\_\_  
CML \_\_\_\_\_  
CTR \_\_\_\_\_  
EAG \_\_\_\_\_  
LEG \_\_\_\_\_  
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GPS \_\_\_\_\_  
RCH \_\_\_\_\_  
SEC \_\_\_\_\_  
WAS \_\_\_\_\_  
OTH \_\_\_\_\_

\_\_\_\_\_ 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.

NIH/amb  
Enclosures  
cc: Mr. Brian Sulmonetti  
Ms. Cathy Bedell

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DOCUMENT NUMBER-DATE  
10856 OCT-28  
FPSC-RECORDS/REPORTING

- A. Leave the demarcation point as defined by Rule 24-4.0345, F.A.C.,

OR

Move demarcation point to FCC MPOE.

Response. The establishment of the demarcation point is not as simple as a "here or there" scenario because each location is going to have some condition which may affect the location of the demarcation point. MCI WorldCom believes that there needs to be flexibility with respect to locating the demarcation point and that the parties should be able to negotiate the location with the MPOE as a default demarcation point. This would permit the parties to reach an agreement that accommodates the needs and interests of both but at the same time provides that there be some access if negotiations are not successful. While it is important to have this flexibility it is also important that access be equal and nondiscriminatory.

- B. All Telecommunications companies shall have access to all customers in a multi-tenant environments for resale, i.e., where no additional telecommunications facilities must be installed; all tenants have access to COLR.

OR

Landlord controls access to telecommunications service; customer can ask to be served by the COLR, if other than provided by landlord.

Response: MCI WorldCom believes that telecommunications providers should have access to all customers in a multi-tenant environment in a resale environment without any impairment. Multi-tenant unit customers should enjoy the benefits of the increased availability of alternative providers — especially in a pure resale arrangement.

- C. All telecommunications companies requiring facilities installation in order to provide service to customers in multi-tenant environments shall be given access under the following conditions:

Customer in multi-tenant environment shall be responsible for obtaining authorization from and providing reasonable, non-discriminatory compensation to landlord for all telecommunication facilities installation requirements of a telecommunications company; and landlord shall provide reasonable, non-discriminatory accommodations.

OR

Customers shall be entitled to access to telecommunications service from any certificated telecommunications company; and landlord and telecommunications companies must reach reasonable accommodation for access.

OR

Landlord shall fully control access to any facilities based carrier other than COLR.

Response: The options described in parts 1 and 3 of this scenario place barriers to access to customers that impair the development of competition and they would not be in the public interest. In subpart 1 the customer is charged with the responsibility to make satisfactory arrangements with a landlord which is an unreasonable burden on the customer. Subpart 3 merely retains the current arrangement and if the legislature had intended that the current arrangement be retained, this study would not have been required. Subpart 2, with the proviso that access be nondiscriminatory, provides the best balance of interests and benefits of competition to consumers.

D. Disputes arising out of determination of reasonable accommodations or compensation shall be within the jurisdiction of the PSC.

OR

Circuit Courts,

Response: MCI WorldCom recognizes that there may be issues that would be more properly in circuit court but the general topic is one within the authority and jurisdiction of the PSC and the PSC has the expertise to resolve these disputes.