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October 5, 1999

VIA HAND DELIVERY

Ms. Blanca S. Bayo, Director
Division of Records and Reporting
The Florida Public Service Commission
2540 Shumard Oaks Boulevard
Tallahassee, FL 32399-0850

Re: Docket No. 990994-TP - Proposed Amendments to Rule 25-4.110, F.A.C.,
Customer Billing for Local Exchange Telephone Companies

Dear Ms. Bayo,

Enclosed for filing in the above-referenced docket are the original and 15 copies
of the post-workshop comments of MCI WorldCom, Inc.

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 in this matter.

Sincerely,

Donna Canzano McNulty
Donna Canzano McNulty

- AFA 2
- APP _____
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- CMU _____
- CTR _____
- EAG _____
- LEG Caldwell
- MAS _____
- OPC _____
- PAI _____
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- OTH _____

cc: Diana Caldwell, staff counsel

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Proposed Amendments to)
Rule 25-4.110, F.A.C.,)
Customer Billing for Local)
Exchange Telephone Companies)
_____)

Docket No. 990994-TP

Filed: October 5, 1999

**POST-WORKSHOP COMMENTS OF
MCI WORLDCOM, INC. AND
ITS OPERATING SUBSIDIARIES**

MCI WorldCom, Inc., and its operating subsidiaries (MCI WorldCom), files its post-workshop comments on the proposed cramming rules. On September 13, 1999, MCI WorldCom filed comments on the proposed rules. Those comments are incorporated herein by reference. During the workshop on September 28, 1999, staff requested additional comments. MCI WorldCom's additional comments follow.

Introduction

MCI WorldCom commends staff and the other parties for working together to try to draft a rule that would implement the statutory provisions without requiring the competitive industry to comply with regulation that is unnecessarily burdensome and expensive to implement. MCI WorldCom also commends staff for listening to many of the comments made by those in the industry and for providing alternative proposals that will implement the intent of the statute.

DOCUMENT NUMBER-DATE

11992 OCT-5

FPSC-RECORDS/REPORTING

Billing format should not apply to ALECs

MCI WorldCom recognizes that this Commission must carefully balance appropriate consumer protection against the consumer benefits of a fully competitive market. The marketplace is the most effective means for protecting consumer interests. Telecommunications companies that do not communicate effectively with their customers will lose those customers. Moreover, Section 364.01(4), Florida Statutes, mandates that the Commission is to promote competition without unnecessary regulation. ALECs must compete for each and every customer and must maintain appropriate customer relations, because there are alternatives in the marketplace if the customer is not satisfied with every aspect of service. Thus, the requirement of applying the billing format to ALECs is burdensome, unnecessary and serves as a barrier to entry.

Information on taxes, fees, and surcharges should be provided upon request.

During the workshop, there was considerable discussion regarding the original proposal to require companies to provide information concerning taxes, fees and surcharges, including specifying the name and the components of each. Although there are a few customers who seek that level of detail, staff acknowledged during the workshop that it was not sure that there are many customers who want this detailed information. Moreover, staff also recognized the need for bills to be clear. In an attempt to balance the two, staff proposed as an alternative to its original proposal that such information be provided to customers upon request. Staff's alternative proposal would be much less confusing to customers reading their bills, while meeting the objective of informing customers who would like to know such information. MCI WorldCom

suggests that the language originally proposed by staff in rule 25-4.110(2)(c), including subparts, be deleted and the following language be inserted:

25-4.110(2)(c) - Companies shall provide customers with general information regarding taxes, fees, and surcharges upon request by the customer.

Upon request, written itemization should be provided once a year for residential customers

Staff asked us to comment on the existing rule requiring written itemization of local billing upon request. During the workshop the parties stated that this requirement is unclear. If staff wants to make this a requirement, MCI WorldCom recommends that it be required to provide written itemization, upon request, only once a year and only for residential customers.

Notification of change in presubscribed carrier should not be modified

Currently, customers must be given notice on the first or second page of the customer's next bill in conspicuous bold face type when the customer's provider of local, local toll, or toll service has been changed. Staff seeks comments on BellSouth's proposal that the notification should be based on Carrier Identification Code (CIC). MCI WorldCom adamantly opposes BellSouth's proposal. First, the objective of providing customer notification is already being accomplished. Second, to require notification based upon a CIC code is not only unnecessary, it could cause customer confusion. Third, such a requirement is also burdensome and expensive for companies, and thus, should not be required by rule.

MCI WorldCom does not object to OPC's proposal if modified, and supports AT&T's alternative

During the workshop, the Office of Public Counsel (OPC) proposed an alternative regarding cramming. It is MCI WorldCom's understanding that this proposal replaces staff's proposed language for revisions to rule 25-4.119. In the event, however, it does not, MCI WorldCom incorporates its preliminary comments, as mentioned previously.

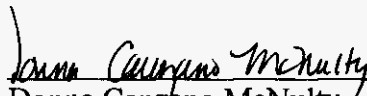
Essentially, OPC proposes that if a customer notifies a billing party that there is a service on his bill that was not ordered or provided, the billing party will remove the charge from the bill, and therefore, the dispute would remain between the billing entity and the customer. Also under the OPC's proposal, customers will have the option to restrict charges on their bills to those imposed by the billing party or affiliate.

The proposal would not apply to a number of services. Moreover, the OPC has circulated a modification to its proposal incorporating MCI WorldCom's comment during the workshop to add calls using a 10-10-XXX calling pattern to its list of exceptions. Upon further review, for clarification, MCI WorldCom also recommends that "residential" be inserted before "customer" in both sections of OPC's proposal. With those modifications, OPC's proposal appears to be a reasonable alternative. MCI WorldCom reserves its right to comment upon the final proposal.

It is MCI WorldCom's understanding that AT&T is proposing an alternative similar to OPC's. Upon preliminary review, MCI WorldCom supports AT&T's proposal.

Safe Harbor provision should be included

MCI WorldCom reiterates that it concurs in the comments of the FCCA and TRA that a safe harbor provision should be adopted so that carriers who have complied with the rules' provisions will be deemed to have complied with the rules.



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its operating subsidiaries
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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing Post-Workshop Comments have been furnished by (*) hand delivery or U.S. Mail this 5th day of October to the following:

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