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June 7, 2000

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BY HAND DELIVERY

Blanca Bayó
Director, Records and Reporting
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, FL 32399

Re: Docket No. 981834-TP and No. 990321-TP

Dear Ms. Bayó:

Enclosed for filing on behalf of MCI WorldCom, Inc. are the original and fifteen copies of its Response in Opposition to Motions for Reconsideration and Clarification.

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

Very truly yours,



Richard D. Melson

RDM/mee
cc: Attached Service List

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FPSC-RECORDS/REPORTING

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

ORIGINAL

In Re: Petition of Competitive Carriers)
For Commission Action to Support Local)
In BellSouth Telecommunications,)
Inc.'s Service Territory)

Docket No. 981834-TP

In Re: Petition of ACI Corp. d/b/a)
Accelerated Connections Inc. for)
Generic Investigations to Ensure that)
BellSouth Telecommunications Inc,)
Sprint-Florida, Incorporated and GTE)
Florida comply with the Obligation to)
To Provide Alternative Local Exchange)
Carriers with Flexible, Timely, and)
Cost-Efficient Physical Collocation.)

Docket No. 990321-TP

Filed: June 7, 2000

**RESPONSE OF MCI WORLDCOM, INC. IN OPPOSITION TO
MOTIONS FOR RECONSIDERATION AND CLARIFICATION**

MCI WorldCom, Inc. ("MWC") hereby files its response in opposition to the motions for reconsideration and clarification filed by BellSouth Telecommunications, Inc. ("BellSouth"), GTE Florida Incorporated ("GTE"), and Sprint-Florida Incorporated and Sprint Communications Company Limited Partnership ("Sprint").

ADOPTION OF FCCA'S RESPONSE

MWC hereby adopts the response filed by the Florida Competitive Carriers' Association ("FCCA") to the BellSouth, GTE, and Sprint motions for reconsideration and clarification.

COPPER ENTRANCE FACILITIES

In Part II of its motion, BellSouth asks the Commission to clarify its order regarding copper entrance facilities in two respects.

First Clarification

BellSouth seeks to clarify that the Commission intended to limit the situation in which an ALEC could use copper entrance cabling

to that involving the use by an ALEC of a controlled environmental value ("CEV") or similar structure constructed or otherwise provided by the ALEC on the same parcel of land as BellSouth's central office (what BellSouth calls adjacent collocation.)

(Motion, page 4)

Second Clarification

In addition, BellSouth seeks clarification from the Commission that the entrance cabling between the ALEC's CEV and BellSouth's central office is distinct from the cabling between the ALEC's central office and BellSouth's central office. The former should be considered as part of a collocation arrangement; the latter should be considered interconnection.

* * *

This authority [sic] should affirm that, consistent with the FCC's Rules in CC Dockets 96-98 and 91-141, BellSouth is not required to accommodate requests for non-fiber optic facilities placed in BellSouth's entrance facilities and the Commission's Order should be clarified on this issue.

(Motion, pages 5, 6)

MWCOM agrees with BellSouth that this docket addressed entrance facilities only in the context of collocation outside the central office when space for physical collocation within the central office is legitimately exhausted. It would therefore be appropriate, although MWCOM believes it unnecessary, to clarify that the Commission's ruling on the use of copper entrance facilities is limited to that collocation situation.

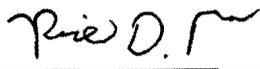
It would be *inappropriate* to go further and to grant BellSouth's request for "clarification" that BellSouth is not required to accommodate requests for non-fiber optic entrance facilities in other circumstances. Such other circumstances were not the subject of this proceeding and the Commission does not have a record basis to address the use of non-fiber optic facilities in those other circumstances.

Contrary to BellSouth's assertion that it is not required to accommodate requests for non-fiber entrance facilities, FCC Rule 51.323(d)(3) specifically permits "interconnection of copper or coaxial cable *if such interconnection is first approved by the state commission.*" (Emphasis added.) The question of whether non-fiber interconnection is allowed between a BellSouth switch and an ALEC switch was not litigated in this docket, and is not ripe for determination at this time. In fact, the question of whether BellSouth should be required to permit copper entrance facilities in situations other than those involving adjacent collocation has been raised as Issue No. 63 in MCI WorldCom's recent petition for arbitration with BellSouth. (Docket No. 000649-TP) The Commission should not prejudge the issue by granting a "clarification" in this case which goes beyond the issue that was framed, litigated and decided.

WHEREFORE, MWCOM respectfully requests that the Commission deny BellSouth's request for clarification of its obligation to permit the use of copper entrance facilities in any situation except the "off-premises" collocation situation addressed in the Order.

RESPECTFULLY SUBMITTED this 7th day of June, 2000.

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By: 

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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 7th day of June, 2000.

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