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January 11, 2002

BY HAND DELIVERY

Blanca Bayó
Division of Commission Clerk
2540 Shumard Oak Boulevard
Tallahassee, FL 32399

RECEIVED - FPSC
02 JAN 11 PM 4:24
COMMISSION
CLERK

Re: Competitive Practices - Docket No. 011077-TP

Dear Ms. Bayó:

Enclosed for filing on behalf of MCI WorldCom Communications, Inc. and MCImetro Access Transmission Services, LLP are the original and 15 copies of their Petition To Intervene.

Also enclosed for the docket file is a copy of a letter to Felicia Banks containing a prioritized list of issues requested by the staff.

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

If you have any questions regarding this filing, please give me a call at 425-2313.

Very truly yours,

Richard D. Melson

- APP _____
- CAF _____
- CMP _____
- COM _____
- CTR _____
- ECR _____
- LEG _____
- OPC 1
- PAI _____
- RGO _____
- SEC 1
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- OTH _____

Enclosures

cc: Certificate of Service

Hong *Done 1/14/02*

DOCUMENT NUMBER-DATE

00438 JAN 11 02

FPSC-COMMISSION CLERK

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Generic Investigation into Whether)	
Competitive Practices of Incumbent and)	Docket No. 011077-TP
Alternative Local Exchange Carriers Comply)	
with Section 364.01(4)(g), Florida Statutes)	Filed: January 11, 2002
_____)		

PETITION TO INTERVENE

MCI WorldCom Communications, Inc. ("MCI WorldCom") and MCImetro Access Transmission Services, LLP ("MCIIm") petition, pursuant to Rule 25-22.039, Florida Administrative Code, for leave to intervene in this docket. In support thereof, Petitioners state:

1. Petitioners' official names and address are:

MCI WorldCom Communications, Inc.
MCImetro Access Transmission Services, LLP
Concourse Corporate Center Six
Six Concourse Parkway, Suite 3200
Atlanta, GA 30328

2. All notices, pleadings and other documents in this matter should be addressed to the following:

Richard D. Melson
Gary V. Perko
Hopping Green & Sams, P.A.
P.O Box 6526
Tallahassee, FL 32314

Donna McNulty
MCI WorldCom, Inc.
325 John Knox Road, Suite 105
Tallahassee, FL 32303

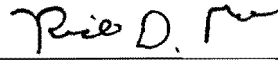
3. MCI WorldCom and MCIIm are certified by the Commission as alternative local exchange carriers. Both are competitors of incumbent local exchange carriers.

4. The substantial interests of both MCI WorldCom and MCIIm will be affected by any Commission decision in this docket that determines whether the competitive practices of

either alternative or incumbent local exchange carriers comply with section 364.01(4)(g), Florida Statutes.

WHEREFORE, MCI WorldCom and MCIIm respectfully request leave to intervene as full parties in this proceeding.

HOPPING GREEN & SAMS, P.A

By: 
Richard D. Melson
Gary V. Perko
P.O. Box 6526
Tallahassee, FL 32314
(850) 425-2313

and

Donna McNulty
MCI WorldCom, Inc.
325 John Knox Road, Suite 105
Tallahassee, FL 32303
(850) 422-1254

ATTORNEYS for MCI WorldCom
Communications, Inc., and MCImetro Access
Transmission Services, LLC.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a copy of this Petition to Intervene was served on the following this 11
day of January, 2002:

AT&T (GA)
Virginia Tate
1200 Peachtree St., NE
Suite 8100
Atlanta, GA 30309

BellSouth Telecommunications, Inc.
Nancy B. White/James Meza III
c/o Ms. Nancy H. Sims
150 South Monroe Street, Suite 400
Tallahassee, FL 32301-1556

Covad Communications Company
Catherine F. Boone
10 Glenlake Parkway, Suite 650
Atlanta, GA 30328-3495

Florida Cable Telecommunications Assoc.,
Inc.
Michael A. Gross
246 E. 6th Avenue, Suite 100
Tallahassee, FL 32303

Florida Digital Network, Inc.
Mr. Matthew Feil
390 North Orange Avenue, Suite 2000
Orlando, FL 32801-1640

Global NAPs, Inc.
William Rooney, General Counsel
10 Merrymount Rd.
Quincy, MA 02169

ITC^DeltaCom
Ms. Nanette S. Edwards
4092 South Memorial Parkway
Huntsville, AL 35802-4343

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Vicki Kaufman/Joseph McGlothlin
117 S. Gadsden St.
Tallahassee, FL 32301

Messer Law Firm
Norman H. Horton, Jr.
215 S. Monroe Street, Suite 701
Tallahassee, FL 32301-1876

Moyle Law Firm
Jon C. Moyle/Cathy M. Sellers
118 North Gadsden Street
Tallahassee, FL 32301

NewSouth Communications Corp.
Ms. Lori Reese
NewSouth Center
Two North Main Street
Greenville, SC 29601-2719

Pennington Law Firm
Peter Dunbar/Karen Camechis
P.O. Box 10095
Tallahassee, FL 32301

Sprint-Florida Incorporated
Mr. F. B. (Ben) Poag
P. O. Box 2214
Tallahassee, FL 32316-2214

Supra Telecommunications & Information
Systems, Inc.(Mia)
Brian Chaiken
2620 S.W. 27th Avenue
Miami, FL 33133

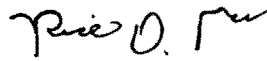
Supra Telecommunications and Information
Systems, Inc.
Ms Ann H. Shelfer
Koger Center - Ellis Building
1311 Executive Center Drive, Suite 200
Tallahassee, FL 32301-5027

Time Warner Telecom of Florida, L.P.
c/o Ms. Carolyn Marek
233 Bramerton Court
Franklin, TN 37069-4002

e.spire Communications, Inc.
Renee Terry
131 National Business Parkway, #100
Annapolis Junction, MD 20701-1001

XO Florida, Inc.
Ms. Dana Shaffer
105 Molloy Street, Suite 100
Nashville, TN 37201-2315

Verizon Florida, Inc.
Ms. Michelle A. Robinson
Mr. David Christian
106 East College Avenue, Suite 810
Tallahassee, FL 32301-7704



Attorney

January 11, 2002

BY HAND DELIVERY

Ms. Felicia Banks
The Florida Public Service Commission
Division of Legal Services
2540 Shumard Oaks Boulevard
Tallahassee, FL 32399-0850

Re: Docket No. 011077-TP

Dear Felicia,

This letter is in response to your memorandum dated December 20, 2001, requesting prioritization of the list of issues you distributed in the above-referenced docket.

Although WorldCom is interested in many issues on staff's proposed list, we believe the following topics need to be addressed first:

- 1) Performance Measurements and Standards for Special Access;
- 2) Change Management;
- 3) Disconnect and New Connect Orders Separated During the Conversion Process.
 - a) Loss of Dial Tone/Ancillary Services During the Switch;
 - b) Phone Service Disruptions After the Switch
- 4) Excessive Features Charges for BellSouth;
- 5) Interactive Agent for BellSouth

BellSouth is the only RBOC that processes MCI's platform EDI orders through a VAN, which essentially creates a stopping point between the ALECs and BellSouth. BellSouth's use of a VAN also causes MCI to use its own third-party VAN provider to link to BellSouth's VAN provider. Orders transmitted from the ALECs to BellSouth and acknowledgements, firm order confirmations and other notifiers from BellSouth to ALECs must pass through the VAN. Orders and notifiers are often delayed significantly in the VAN and may be lost altogether.

The industry has chosen a specific Interactive Agent as the method for submitting high volumes of orders in a competitive production environment. With other BOCs, MCI submits its orders using Interactive

Agent directly to the BOC and receives acknowledgements, firm order confirmations and other notices directly back from the BOC. Interactive Agent also allows ALECs to send orders individually, rather than in batches, and has a log file that allows parties rapidly to search for missing orders and notifiers.

6) Line Loss Report

In its *Pennsylvania Order* ¶ 52, the FCC explained the need for a BOC to provide CLECs with accurate line loss reports. Without such reports, a CLEC will continue to bill the end user even after the end user has discontinued service with the carrier.

BellSouth is failing to submit line loss reports for a significant number customers. The impact of missing line loss reports is severe. Without a line loss report, MCI does not know to stop billing the customer. Therefore, the customer is billed by both MCI and the customer's new carrier.

7) Sharing of Information between Retail and Wholesale Units

If you have any questions, please contact me at your convenience.

Sincerely,



Donna Canzano McNulty

cc: Cheryl Bulzca-Banks