

November 13, 2002

Dayna Garvin
MCI WorldCom
2678 Bishop Drive, Suite 200
San Ramon, CA 94583

Dear Dayna,

I am writing to you in response to your letter of November 6, 2002. You have raised several issues in your letter and I will address these issues separately in this response.

- 1) To begin with, I am confused as to why over half of your letter is devoted to quoting the interconnection agreement specifics on traffic termination and interconnection methods. I believe that I made it quite clear from our first conversation that CenturyTel has every intention of honoring the specifics of the Verizon agreement that you opted into in Missouri as well as the CenturyTel agreement that you opted into in Alabama. In fact, I was the person who originally referenced the exact agreement language to WorldCom. Given that fact, there seems to be no dispute in this area. CenturyTel will honor your bona fide interconnection requests and implement interconnection as specified in the exact language of each agreement.
- 2) Re your references to LRNs, porting and NANPA, as you know, NANPA is merely a numbers administration organization. NANPA does not establish Section 251 interconnection policy nor Part 52 Local Number Portability policy. Accordingly, I have spent the past couple of days refamiliarizing myself with all FCC orders and number administration practices on both LRNs and LNP. It is quite clear in all documents that as regards Location Routing Numbers (LRNs) and their use for Local Number Portability (LNP), the operative words are "routing" and "local."

LNP was established for the sole purpose of permitting an in-place (not physically relocating) end user the opportunity to change his local service provider yet retain his existing local telephone number. To that purpose, the end user can port his number only to a provider who offers local service in the same rate center as his existing provider. The LRN is merely a number that is used for routing a ported number from the original provider to the alternative provider's switch, said switch containing the alternate provider's NXX that is local to the original provider's rate center. The documentation is quite clear that LNP is not to be used to port numbers to a non-local NXX. As such, for WorldCom to port local CenturyTel numbers, WorldCom is required by FCC policy to have an NXX that is local to those ported numbers. You may indeed use a switch that is not in the local calling area but you must have an NXX in that switch that is local to our rate center and

provide appropriate networking to bring calls from the local area to your switch and return for local termination. Accordingly, as soon as WorldCom NXXs which are local to the CenturyTel rate centers appear in the LERG, we will accept your interconnection requests as bona fide. With interconnection in place (and provided that LNP capability has been activated in our switch), you may port numbers using the industry standard LRN method. I do believe this situation already exists for Columbia, MO so you may initiate your request for that market.

- 3) Although you do not state this in your letter, several WorldCom personnel have made it known to CenturyTel that it is your intention to use this interconnection solely for the purpose of disconnecting and replacing your present TCP/IP data aggregation service in MO and AL. I do not believe the FCC intended Section 251 to apply to CLECs who wished to migrate previously tariffed services to a local interconnection agreement to eliminate paying for those services without actively engaging in true local competition efforts. If this is the case, CenturyTel will bring this matter to the attention of state and Federal regulatory bodies for their investigation into the appropriateness of WorldCom's actions.
- 4) Also as regards your TCP/IP service, please keep in mind that when CenturyTel acquired the Verizon properties in MO and AL, we also acquired all in place contractual and tariffed arrangements. I direct you to CenturyTel's FCC Tariff No. 2- Section 7- Specialized FIA Or Arrangements, 7.2.1- MCI WorldCom Network Services, Inc. Subsection D states that this service shall be provided to WorldCom (previously UUNet) with a three (3) year commitment period and that all ports are committed for 36 months from the tariff effective date. Subsection G further states that WorldCom is required to maintain the minimum port commitment plus actually increase the port number by a specified amount by month 36. Should WorldCom issue any cancellation notice, the committed port billing will continue for the term of the arrangement and CenturyTel will expect payment on time and in full per your bankruptcy court requirements.

CenturyTel looks forward to working with WorldCom to implement all of your bona fide interconnection requests.

Sincerely,

Guy Miller
Director- Carrier Relations